

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION

*This document relates to:*

Case No. 1:17-op-45053 and  
Case No. 1:17-op-45054 (S.D. W.Va.)

CABELL COUNTY COMMISSION and  
CITY OF HUNTINGTON, WEST  
VIRGINIA,

Plaintiff,

PURDUE PHARMA L.P., *et al.*

Defendants.

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**DEFENDANT AMERISOURCEBERGEN DRUG CORPORATION'S  
ANSWER WITH AFFIRMATIVE DEFENSES**

Defendant AmerisourceBergen Drug Corporation ("Defendant") hereby responds to the Corrected Joint and Third Amended Complaint of Plaintiffs Cabell County Commission and City of Huntington, West Virginia ("Plaintiffs") as follows:

**PRELIMINARY STATEMENT**<sup>1</sup>

1. The allegations contained in Paragraph 1 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 1 of the Complaint set forth purported medical and/or expert opinions, no response is required. By way of further response, while Defendant does not deny the existence of an opioid epidemic that raises many complex issues, as a wholesale distributor of prescription medications, Defendant has a limited role in the healthcare supply chain and does not control how medications that it distributes are prescribed, dispensed, or ultimately used. Nor does Defendant promote the

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<sup>1</sup> Defendant includes the headings from the Complaint only for ease and convenience of the Court and the parties. Defendant neither admits nor endorses the content of any such heading.

prescribing or use of medications, including opioids, to doctors or patients, or determine the appropriate supply of opioids. Defendant has and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1.

2. The allegations contained in Paragraph 2 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 2 of the Complaint, and therefore denies the same.

3. The allegations contained in Paragraph 3 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 3 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 3 of the Complaint, and therefore denies the same.

4. The allegations contained in Paragraph 4 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 4 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant admits only that Defendant is a wholesale distributor of various prescription medications (as well as over-the-counter medications) and that Defendant has distributed controlled substances, including opioids, to retail pharmacies and other entities located in Cabell County and the City of Huntington only to the extent that those pharmacies and other entities are registered with the DEA and licensed in West Virginia. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 4.

5. The allegations contained in Paragraph 5 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 5 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 5 of the Complaint, and therefore denies the same.

6. The allegations contained in Paragraph 6 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 6 of the Complaint, and therefore denies the same.

7. The allegations contained in Paragraph 7 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 7 of the Complaint, and therefore denies the same.

8. The allegations contained in Paragraph 8 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 8 of the Complaint, and therefore denies the same.

9. The allegations contained in Paragraph 9 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 9 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent Paragraph 9 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient

knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 9 of the Complaint, and therefore denies the same.

10. The allegations contained in Paragraph 10 of the Complaint set forth legal argument and legal conclusions to which no response is required. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 10.

11. The allegations contained in Paragraph 11 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 11 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 11.

12. The allegations contained in Paragraph 12 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 12 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 12.

13. Defendant denies the allegations contained in Paragraph 13 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 13 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 13 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 13 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent Paragraph 13 of the Complaint

purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

14. The allegations contained in Paragraph 14 of the Complaint set forth legal argument and legal conclusions to which no response is required. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 14.

15. Defendant denies the allegations contained in Paragraph 15 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 15 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 15 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 15.

16. Defendant denies the allegations contained in Paragraph 16 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 16 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 16 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 16 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the

DEA. Further, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 16.

17. The allegations contained in Paragraph 17 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 17 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 17 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 17 of the Complaint, and therefore denies the same.

18. Defendant denies the allegations contained in Paragraph 18 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 18 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 18 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 18 of the Complaint set forth purported medical and/or expert opinions, no response is required.

19. Defendant denies the allegations contained in Paragraph 19 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 19 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 19 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 19 of the Complaint set forth purported medical and/or expert opinions, no response is required. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 19.

20. The allegations contained in Paragraph 20 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 20 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 20 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 20 of the Complaint, and therefore denies the same.

21. Defendant denies the allegations contained in Paragraph 21 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 21 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 21 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 21.

22. Defendant denies the allegations contained in Paragraph 22 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 22 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 22 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 22 of the Complaint set forth purported medical and/or expert opinions, no response is required. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 22.

23. Defendant denies the allegations contained in Paragraph 23 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 23 of the

Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 23 of the Complaint set forth legal arguments and legal conclusions, no response is required.

24. The allegations contained in Paragraph 24 of the Complaint set forth purported medical and/or expert opinions, to which no response is required. To the extent the allegations contained in Paragraph 24 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 24 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 24 of the Complaint, and therefore denies the same.

25. Defendant denies the allegations contained in Paragraph 25 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 25 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 25 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 25.

## **PARTIES**

### **I. PLAINTIFFS**

26. The allegations contained in Paragraph 26 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 26 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent Paragraph 26



of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 26 of the Complaint, and therefore denies the same.

27. The allegations contained in Paragraph 27 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 27 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 27 of the Complaint, and therefore denies the same.

28. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 28 of the Complaint, and therefore denies the same.

29. The allegations contained in Paragraph 29 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 29 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent Paragraph 29 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 29 of the Complaint, and therefore denies the same.

30. The allegations contained in Paragraph 30 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 30 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is

required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 30 of the Complaint, and therefore denies the same.

31. The allegations contained in Paragraph 31 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 31 of the Complaint, and therefore denies the same.

32. The allegations contained in Paragraph 32 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 32 of the Complaint, and therefore denies the same.

33. The allegations contained in Paragraph 33 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 33 of the Complaint, and therefore denies the same.

34. The allegations contained in Paragraph 34 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 34 of the Complaint, and therefore denies the same.

35. The allegations contained in Paragraph 35 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 35 of the Complaint, and therefore denies the same.

36. The allegations contained in Paragraph 36 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 36 of the Complaint set forth purported medical and/or expert opinions, no response is

required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 36 of the Complaint, and therefore denies the same.

37. Defendant denies the allegations contained in Paragraph 37 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 37 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 37 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 37.

38. Defendant denies the allegations contained in Paragraph 38 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 38 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 38 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 38.

39. Defendant denies the allegations contained in Paragraph 39 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 39 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 39 of the Complaint set forth legal arguments and legal conclusions, no response is required.

40. Defendant denies the allegations contained in Paragraph 40 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 40 of the

Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 40 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 40.

41. Defendant denies the allegations contained in Paragraph 41 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 41 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 41 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 41 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

## **II. DEFENDANTS**

### **A. Manufacturer Defendants**

42. Defendant denies the allegations contained in Paragraph 42 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 42 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 42 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant has a limited role in the healthcare supply chain and does not control how medications that it distributes are prescribed, dispensed, or ultimately used. Nor does Defendant promote the prescribing or use of medications, including opioids, to doctors or patients, or determine the appropriate supply of opioids. Defendant states that Defendant has complied and continues to comply with its legal

obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 42.

**1. Purdue Companies**

43. The allegations contained in Paragraph 43 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 43 of the Complaint. To the extent the allegations contained in Paragraph 43 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 43 of the Complaint, and therefore denies the same.

44. The allegations contained in Paragraph 44 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 44 of the Complaint. To the extent the allegations contained in Paragraph 44 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 44 of the Complaint, and therefore denies the same.

45. The allegations contained in Paragraph 45 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 45 of the Complaint. To the extent the allegations contained in Paragraph 45 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 45 of the Complaint, and therefore denies the same.

46. The allegations contained in Paragraph 46 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 46 of the Complaint. To the extent the allegations contained in Paragraph 46 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 46 of the Complaint, and therefore denies the same.

47. The allegations contained in Paragraph 47 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 47 of the Complaint. To the extent the allegations contained in Paragraph 47 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 47 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 47 of the Complaint, and therefore denies the same.

48. The allegations contained in Paragraph 48 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 48 of the Complaint. To the extent the allegations contained in Paragraph 48 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 48 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 48 of the Complaint, and therefore denies the same.

49. The allegations contained in Paragraph 49 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 49 of the Complaint. To the extent the allegations contained in Paragraph 49 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 49 of the Complaint, and therefore denies the same.

50. The allegations contained in Paragraph 50 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 50 of the Complaint. To the extent the allegations contained in Paragraph 50 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 50 of the Complaint, and therefore denies the same.

51. The allegations contained in Paragraph 51 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 51 of the Complaint. To the extent the allegations contained in Paragraph 51 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 51 of the Complaint, and therefore denies the same.

## **2. Purdue Directors and Officers**

52. The allegations contained in Paragraph 52 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 52 of the Complaint. To the extent the allegations contained in Paragraph 52 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 52 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 52 of the Complaint, and therefore denies the same.

53. The allegations contained in Paragraph 53 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 53 of the Complaint. To the extent the allegations contained in Paragraph 53 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 53 of the Complaint, and therefore denies the same.

54. The allegations contained in Paragraph 54 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 54 of the Complaint. To the extent the allegations contained in Paragraph 54 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 54 of the Complaint, and therefore denies the same.

55. The allegations contained in Paragraph 55 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 55 of the Complaint. To the extent the allegations contained in Paragraph 55 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 55 of the Complaint, and therefore denies the same.

56. The allegations contained in Paragraph 56 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 56 of the Complaint. To the



extent the allegations contained in Paragraph 56 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 56 of the Complaint, and therefore denies the same.

57. The allegations contained in Paragraph 57 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 57 of the Complaint. To the extent the allegations contained in Paragraph 57 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 57 of the Complaint, and therefore denies the same.

58. The allegations contained in Paragraph 58 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 58 of the Complaint. To the extent the allegations contained in Paragraph 58 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 58 of the Complaint, and therefore denies the same.

59. The allegations contained in Paragraph 59 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 59 of the Complaint. To the extent the allegations contained in Paragraph 59 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 59 of the Complaint, and therefore denies the same.

60. The allegations contained in Paragraph 60 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 60 of the Complaint. To the extent the allegations contained in Paragraph 60 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 60 of the Complaint, and therefore denies the same.

61. The allegations contained in Paragraph 61 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 61 of the Complaint. To the extent the allegations contained in Paragraph 61 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 61 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 61 of the Complaint, and therefore denies the same.

62. The allegations contained in Paragraph 62 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 62 of the Complaint. To the extent the allegations contained in Paragraph 62 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 62 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 62 of the Complaint, and therefore denies the same.

63. The allegations contained in Paragraph 63 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 63 of the Complaint. To the extent the allegations contained in Paragraph 63 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent Paragraph 63 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 63 of the Complaint, and therefore denies the same.

64. The allegations contained in Paragraph 64 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 64 of the Complaint. To the extent the allegations contained in Paragraph 64 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 64 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 64 of the Complaint, and therefore denies the same.

65. The allegations contained in Paragraph 65 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 65 of the Complaint. To the extent the allegations contained in Paragraph 65 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 65 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 65 of the Complaint, and therefore denies the same.

66. The allegations contained in Paragraph 66 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 66 of the Complaint. To the extent the allegations contained in Paragraph 66 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent Paragraph 66 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 66 of the Complaint, and therefore denies the same.

67. The allegations contained in Paragraph 67 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 67 of the Complaint. To the extent the allegations contained in Paragraph 67 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 67 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 67 of the Complaint, and therefore denies the same.

68. The allegations contained in Paragraph 68 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 68 of the Complaint. To the extent the allegations contained in Paragraph 68 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 68 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 68 of the Complaint, and therefore denies the same.

69. The allegations contained in Paragraph 69 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 69 of the Complaint. To the extent the allegations contained in Paragraph 69 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent Paragraph 69 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 69 of the Complaint, and therefore denies the same.

**3. Actavis Entities**

70. The allegations contained in Paragraph 70 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 70 of the Complaint. To the extent the allegations contained in Paragraph 70 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 70 of the Complaint, and therefore denies the same.

71. The allegations contained in Paragraph 71 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 71 of the Complaint. To the extent the allegations contained in Paragraph 71 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 71 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 71 of the Complaint, and therefore denies the same.

72. The allegations contained in Paragraph 72 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 72 of the Complaint. To the extent the allegations contained in Paragraph 72 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 72 of the Complaint, and therefore denies the same.

73. The allegations contained in Paragraph 73 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 73 of the Complaint. To the extent the allegations contained in Paragraph 73 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 73 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 73 of the Complaint, and therefore denies the same.

74. The allegations contained in Paragraph 74 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 74 of the Complaint. To the extent the allegations contained in Paragraph 74 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 74 of the Complaint, and therefore denies the same.

75. The allegations contained in Paragraph 75 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 75 of the Complaint. To the extent the allegations contained in Paragraph 75 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 75 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 75 of the Complaint, and therefore denies the same.

76. The allegations contained in Paragraph 76 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 76 of the Complaint. To the extent the allegations contained in Paragraph 76 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 76 of the Complaint, and therefore denies the same.

77. The allegations contained in Paragraph 77 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 77 of the Complaint. To the extent the allegations contained in Paragraph 77 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 77 of the Complaint, and therefore denies the same.

78. The allegations contained in Paragraph 78 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 78 of the Complaint. To the extent the allegations contained in Paragraph 78 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 78 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 78 of the Complaint, and therefore denies the same.

79. The allegations contained in Paragraph 79 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 79 of the Complaint. To the extent the allegations contained in Paragraph 79 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 79 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 79 of the Complaint, and therefore denies the same.

80. The allegations contained in Paragraph 80 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 80 of the Complaint. To the extent the allegations contained in Paragraph 80 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 80 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 80 of the Complaint, and therefore denies the same.

81. The allegations contained in Paragraph 81 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 81 of the Complaint. To the extent the allegations contained in Paragraph 81 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 81 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 81 of the Complaint, and therefore denies the same.

82. The allegations contained in Paragraph 82 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at



Defendant, Defendant denies the allegations contained in Paragraph 82 of the Complaint. To the extent the allegations contained in Paragraph 82 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 82 of the Complaint, and therefore denies the same.

83. The allegations contained in Paragraph 83 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 83 of the Complaint. To the extent the allegations contained in Paragraph 83 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 83 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 83 of the Complaint, and therefore denies the same.

84. The allegations contained in Paragraph 84 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 84 of the Complaint. To the extent the allegations contained in Paragraph 84 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 84 of the Complaint, and therefore denies the same.

85. The allegations contained in Paragraph 85 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 85 of the Complaint. To the extent the allegations contained in Paragraph 85 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 85 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 85 of the Complaint, and therefore denies the same.

86. The allegations contained in Paragraph 86 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 86 of the Complaint. To the extent the allegations contained in Paragraph 86 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 86 of the Complaint, and therefore denies the same.

87. The allegations contained in Paragraph 87 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 87 of the Complaint. To the extent the allegations contained in Paragraph 87 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 87 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 87 of the Complaint, and therefore denies the same.

88. The allegations contained in Paragraph 88 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 88 of the Complaint. To the extent the allegations contained in Paragraph 88 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 88 of the Complaint, and therefore denies the same.

**4. Janssen Entities**

89. The allegations contained in Paragraph 89 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 89 of the Complaint. To the extent the allegations contained in Paragraph 89 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 89 of the Complaint, and therefore denies the same.

90. The allegations contained in Paragraph 90 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 90 of the Complaint. To the extent the allegations contained in Paragraph 90 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 90 of the Complaint, and therefore denies the same.

91. The allegations contained in Paragraph 91 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 91 of the Complaint. To the extent the allegations contained in Paragraph 91 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 91 of the Complaint, and therefore denies the same.

92. The allegations contained in Paragraph 92 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 92 of the Complaint. To the extent the allegations contained in Paragraph 92 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 92 of the Complaint, and therefore denies the same.

93. The allegations contained in Paragraph 93 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 93 of the Complaint. To the extent the allegations contained in Paragraph 93 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 93 of the Complaint, and therefore denies the same.

94. The allegations contained in Paragraph 94 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 94 of the Complaint. To the extent the allegations contained in Paragraph 94 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 94 of the Complaint, and therefore denies the same.

95. The allegations contained in Paragraph 95 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 95 of the Complaint. To the extent the allegations contained in Paragraph 95 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 95 of the Complaint, and therefore denies the same.

96. The allegations contained in Paragraph 96 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 96 of the Complaint. To the extent the allegations contained in Paragraph 96 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 96 of the Complaint, and therefore denies the same.

97. The allegations contained in Paragraph 97 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 97 of the Complaint. To the extent the allegations contained in Paragraph 97 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 97 of the Complaint, and therefore denies the same.

98. The allegations contained in Paragraph 98 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 98 of the Complaint. To the extent the allegations contained in Paragraph 98 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 98 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 98 of the Complaint, and therefore denies the same.

99. The allegations contained in Paragraph 99 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 99 of the Complaint. To the extent the allegations contained in Paragraph 99 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 99 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 99 of the Complaint, and therefore denies the same.

**5. Endo Entities**

100. The allegations contained in Paragraph 100 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 100 of the Complaint. To the extent the allegations contained in Paragraph 100 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 100 of the Complaint, and therefore denies the same.

101. The allegations contained in Paragraph 101 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 101 of the Complaint. To the extent the allegations contained in Paragraph 101 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 101 of the Complaint, and therefore denies the same.

102. The allegations contained in Paragraph 102 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 102 of the Complaint. To the extent the allegations contained in Paragraph 102 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 102 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 102 of the Complaint, and therefore denies the same.

103. The allegations contained in Paragraph 103 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 103 of the Complaint. To the extent the allegations contained in Paragraph 103 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 103 of the Complaint, and therefore denies the same.

104. The allegations contained in Paragraph 104 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 104 of the Complaint. To the extent the allegations contained in Paragraph 104 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 104 of the Complaint, and therefore denies the same.

105. The allegations contained in Paragraph 105 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 105 of the Complaint. To the extent the allegations contained in Paragraph 105 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 105 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 105 of the Complaint, and therefore denies the same.

## **6. Cephalon Entities**

106. The allegations contained in Paragraph 106 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 106 of the Complaint. To the extent the allegations contained in Paragraph 106 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 106 of the Complaint, and therefore denies the same.

107. The allegations contained in Paragraph 107 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 107 of the Complaint. To the extent the allegations contained in Paragraph 107 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 107 of the Complaint, and therefore denies the same.

108. The allegations contained in Paragraph 108 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 108 of the Complaint. To the extent the allegations contained in Paragraph 108 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 108 of the Complaint, and therefore denies the same.

109. The allegations contained in Paragraph 109 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 109 of the Complaint. To the extent the allegations contained in Paragraph 109 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 109 of the Complaint, and therefore denies the same.



**7. Mallinckrodt Entities**

110. The allegations contained in Paragraph 110 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 110 of the Complaint. To the extent the allegations contained in Paragraph 110 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 110 of the Complaint, and therefore denies the same.

111. The allegations contained in Paragraph 111 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 111 of the Complaint. To the extent the allegations contained in Paragraph 111 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 111 of the Complaint, and therefore denies the same.

112. The allegations contained in Paragraph 112 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 112 of the Complaint. To the extent the allegations contained in Paragraph 112 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 112 of the Complaint, and therefore denies the same.

113. The allegations contained in Paragraph 113 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 113 of the Complaint. To the extent the allegations contained in Paragraph 113 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 113 of the Complaint, and therefore denies the same.

114. The allegations contained in Paragraph 114 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 114 of the Complaint. To the extent the allegations contained in Paragraph 114 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 114 of the Complaint, and therefore denies the same.

115. The allegations contained in Paragraph 115 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 115 of the Complaint. To the extent the allegations contained in Paragraph 115 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 115 of the Complaint, and therefore denies the same.

116. The allegations contained in Paragraph 116 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 116 of the Complaint. To the extent the allegations contained in Paragraph 116 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 116 of the Complaint, and therefore denies the same.

117. The allegations contained in Paragraph 117 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 117 of the Complaint. To the extent the allegations contained in Paragraph 117 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 117 of the Complaint, and therefore denies the same.

118. The allegations contained in Paragraph 118 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 118 of the Complaint. To the extent the allegations contained in Paragraph 118 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 118 of the Complaint, and therefore denies the same.

**8. KVK Tech**

119. The allegations contained in Paragraph 119 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 119 of the Complaint. To the extent the allegations contained in Paragraph 119 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 119 of the Complaint, and therefore denies the same.

120. The allegations contained in Paragraph 120 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 120 of the Complaint. To the extent the allegations contained in Paragraph 120 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 120 of the Complaint, and therefore denies the same.

**9. Amneal Pharmaceuticals**

121. The allegations contained in Paragraph 121 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 121 of the Complaint. To the extent the allegations contained in Paragraph 121 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 121 of the Complaint, and therefore denies the same.

122. The allegations contained in Paragraph 122 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 122 of the Complaint. To the extent the allegations contained in Paragraph 122 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 122 of the Complaint, and therefore denies the same.

123. The allegations contained in Paragraph 123 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 123 of the Complaint. To the extent the allegations contained in Paragraph 123 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 123 of the Complaint, and therefore denies the same.

**B. Distributor Defendants**

124. Defendant denies the allegations contained in Paragraph 124 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 124 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the

allegations contained in Paragraph 124 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 124 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. By way of further response, Defendant admits that Defendant is a wholesale distributor of various prescription medications (as well as over-the-counter medications) and that Defendant has distributed controlled substances, including opioids, to retail pharmacies and other entities located in Cabell County and the City of Huntington only to the extent that those pharmacies and other entities are registered with the DEA and licensed in West Virginia. Defendant further states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 124.

125. Defendant denies the allegations contained in Paragraph 125 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 125 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 125 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant admits only that Defendant is a wholesale distributor of various prescription medications (as well as over-the-counter medications) and that Defendant has distributed controlled substances, including opioids, to retail pharmacies and other entities located in Cabell County and the City of Huntington only to the extent that those pharmacies and other entities are registered with the DEA and licensed in West Virginia. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 125.

126. Defendant denies the allegations contained in Paragraph 126 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 126 of the

Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 126 of the Complaint set forth legal arguments and legal conclusions, no response is required.

**1. AmerisourceBergen**

127. Defendant admits that it is a Delaware corporation with a principal place of business located at 1300 Morris Drive, Chesterbrook, Pennsylvania 19087. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 127.

128. The allegations contained in Paragraph 128 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 128 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant admits that Defendant is a wholesale distributor of various prescription medications (as well as over-the-counter medications) and that Defendant has distributed controlled substances, including opioids, to retail pharmacies and other entities located in West Virginia only to the extent that those pharmacies and other entities are registered with the DEA and licensed in West Virginia. Defendant also admits that Defendant is registered to conduct business in West Virginia. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 128.

129. The allegations contained in Paragraph 129 of the Complaint set forth legal argument and legal conclusions to which no response is required. By way of further response, Defendant admits only that Defendant is a licensed wholesale distributor of various prescription medications (as well as over-the-counter medications) and that Defendant has distributed controlled substances, including opioids, to retail pharmacies and other entities located in Cabell County and the City of Huntington only to the extent that those pharmacies and other entities are

registered with the DEA and licensed in West Virginia. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 129.

130. The allegations contained in Paragraph 130 of the Complaint set forth legal argument and legal conclusions to which no response is required. By way of further response, Defendant admits only that Defendant is a licensed wholesale distributor of various prescription medications (as well as over-the-counter medications) and that Defendant has distributed controlled substances, including opioids, to retail pharmacies and other entities located in Cabell County and the City of Huntington only to the extent that those pharmacies and other entities are registered with the DEA and licensed in West Virginia. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 130.

131. The allegations contained in Paragraph 131 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 131 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Further, Defendant admits only that Defendant is a wholesale distributor of various prescription medications (as well as over-the-counter medications) and that Defendant has distributed controlled substances, including opioids, to retail pharmacies and other entities located in Cabell County and the City of Huntington only to the extent that those pharmacies and other entities are registered with the DEA and licensed in West Virginia. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 131.

132. The allegations contained in Paragraph 132 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 132 of the Complaint, and therefore denies the same.

**2. Cardinal Health**

133. The allegations contained in Paragraph 133 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 133 of the Complaint. To the extent the allegations contained in Paragraph 133 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 133 of the Complaint, and therefore denies the same.

134. The allegations contained in Paragraph 134 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 134 of the Complaint. To the extent the allegations contained in Paragraph 134 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 134 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent Paragraph 134 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 134 of the Complaint, and therefore denies the same.

135. The allegations contained in Paragraph 135 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 135 of the Complaint. To the extent the allegations contained in Paragraph 135 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 135 of the Complaint, and therefore denies the same.



136. The allegations contained in Paragraph 136 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 136 of the Complaint. To the extent the allegations contained in Paragraph 136 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 136 of the Complaint, and therefore denies the same.

137. The allegations contained in Paragraph 137 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 137 of the Complaint. To the extent the allegations contained in Paragraph 137 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 137 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 137 of the Complaint, and therefore denies the same.

138. The allegations contained in Paragraph 138 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 138 of the Complaint. To the extent the allegations contained in Paragraph 138 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 138 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 138 of the Complaint, and therefore denies the same.

139. The allegations contained in Paragraph 139 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 139 of the Complaint. To the extent the allegations contained in Paragraph 139 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 139 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 139 of the Complaint, and therefore denies the same.

**3. McKesson**

140. The allegations contained in Paragraph 140 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 140 of the Complaint. To the extent the allegations contained in Paragraph 140 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 140 of the Complaint, and therefore denies the same.

141. The allegations contained in Paragraph 141 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 141 of the Complaint. To the extent the allegations contained in Paragraph 141 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 141 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 141 of the Complaint, and therefore denies the same.

142. The allegations contained in Paragraph 142 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 142 of the Complaint. To the extent the allegations contained in Paragraph 142 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 142 of the Complaint, and therefore denies the same.

143. The allegations contained in Paragraph 143 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 143 of the Complaint. To the extent the allegations contained in Paragraph 143 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 143 of the Complaint, and therefore denies the same.

144. The allegations contained in Paragraph 144 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 144 of the Complaint. To the extent the allegations contained in Paragraph 144 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 144 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 144 of the Complaint, and therefore denies the same.

145. The allegations contained in Paragraph 145 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 145 of the Complaint. To the extent the allegations contained in Paragraph 145 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 145 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 145 of the Complaint, and therefore denies the same.

**4. H.D. Smith Wholesale Drug Co.**

146. The allegations contained in Paragraph 146 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 146 of the Complaint. To the extent the allegations contained in Paragraph 146 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 146 of the Complaint, and therefore denies the same.

147. The allegations contained in Paragraph 147 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 147 of the Complaint. To the extent the allegations contained in Paragraph 147 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 147 of the Complaint, and therefore denies the same.

148. The allegations contained in Paragraph 148 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 148 of the Complaint. To the extent the allegations contained in Paragraph 148 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 148 of the Complaint, and therefore denies the same.

149. The allegations contained in Paragraph 149 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 149 of the Complaint. To the extent the allegations contained in Paragraph 149 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 149 of the Complaint, and therefore denies the same.

150. The allegations contained in Paragraph 150 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 150 of the Complaint. To the extent the allegations contained in Paragraph 150 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 150 of the Complaint, and therefore denies the same.

## **5. CVS**

151. The allegations contained in Paragraph 151 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 151 of the Complaint. To the extent the allegations contained in Paragraph 151 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 151 of the Complaint, and therefore denies the same.

152. The allegations contained in Paragraph 152 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 152 of the Complaint. To the extent the allegations contained in Paragraph 152 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 152 of the Complaint, and therefore denies the same.

153. The allegations contained in Paragraph 153 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 153 of the Complaint. To the extent the allegations contained in Paragraph 153 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 153 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 153 of the Complaint, and therefore denies the same.

154. The allegations contained in Paragraph 154 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 154 of the Complaint. To the extent the allegations contained in Paragraph 154 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 154 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 154 of the Complaint, and therefore denies the same.

155. The allegations contained in Paragraph 155 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 155 of the Complaint. To the extent the allegations contained in Paragraph 155 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 155 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves,

and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 155 of the Complaint, and therefore denies the same.

156. The allegations contained in Paragraph 156 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 156 of the Complaint. To the extent the allegations contained in Paragraph 156 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 156 of the Complaint, and therefore denies the same.

157. The allegations contained in Paragraph 157 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 157 of the Complaint. To the extent the allegations contained in Paragraph 157 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 157 of the Complaint, and therefore denies the same.

158. The allegations contained in Paragraph 158 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 158 of the Complaint. To the extent the allegations contained in Paragraph 158 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 158 of the Complaint, and therefore denies the same.

159. The allegations contained in Paragraph 159 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 159 of the Complaint. To the

extent the allegations contained in Paragraph 159 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 159 of the Complaint, and therefore denies the same.

160. The allegations contained in Paragraph 160 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 160 of the Complaint. To the extent the allegations contained in Paragraph 160 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 160 of the Complaint, and therefore denies the same.

161. The allegations contained in Paragraph 161 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 161 of the Complaint. To the extent the allegations contained in Paragraph 161 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 161 of the Complaint, and therefore denies the same.

162. The allegations contained in Paragraph 162 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 162 of the Complaint. To the extent the allegations contained in Paragraph 162 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 162 of the Complaint, and therefore denies the same.

163. The allegations contained in Paragraph 163 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at



Defendant, Defendant denies the allegations contained in Paragraph 163 of the Complaint. To the extent the allegations contained in Paragraph 163 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 163 of the Complaint, and therefore denies the same.

164. The allegations contained in Paragraph 164 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 164 of the Complaint. To the extent the allegations contained in Paragraph 164 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 164 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 164 of the Complaint, and therefore denies the same.

165. The allegations contained in Paragraph 165 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent they are directed at Defendant, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 165 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

166. The allegations contained in Paragraph 166 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 166 of the Complaint. To the extent the allegations contained in Paragraph 166 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 166 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 166 of the Complaint, and therefore denies the same.

167. The allegations contained in Paragraph 167 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 167 of the Complaint. To the extent the allegations contained in Paragraph 167 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 167 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 167 of the Complaint, and therefore denies the same.

168. The allegations contained in Paragraph 168 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 168 of the Complaint. To the extent the allegations contained in Paragraph 168 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 168 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 168 of the Complaint, and therefore denies the same.

169. The allegations contained in Paragraph 169 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 169 of the Complaint. To the extent the allegations contained in Paragraph 169 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 169 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 169 of the Complaint, and therefore denies the same.

170. Defendant denies the allegations contained in Paragraph 170 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 170 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 170 of the Complaint set forth legal arguments and legal conclusions, no response is required.

171. The allegations contained in Paragraph 171 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 171 of the Complaint. To the extent the allegations contained in Paragraph 171 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 171 of the Complaint, and therefore denies the same.

172. The allegations contained in Paragraph 172 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 172 of the Complaint. To the extent the allegations contained in Paragraph 172 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 172 of the Complaint, and therefore denies the same.

173. The allegations contained in Paragraph 173 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 173 of the Complaint. To the extent the allegations contained in Paragraph 173 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 173 of the Complaint, and therefore denies the same.

174. The allegations contained in Paragraph 174 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 174 of the Complaint. To the extent the allegations contained in Paragraph 174 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 174 of the Complaint, and therefore denies the same.

175. The allegations contained in Paragraph 175 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 175 of the Complaint. To the extent the allegations contained in Paragraph 175 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 175 of the Complaint, and therefore denies the same.

176. The allegations contained in Paragraph 176 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 176 of the Complaint. To the extent the allegations contained in Paragraph 176 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 176 of the Complaint, and therefore denies the same.

177. The allegations contained in Paragraph 177 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 177 of the Complaint. To the

extent the allegations contained in Paragraph 177 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 177 of the Complaint, and therefore denies the same.

178. The allegations contained in Paragraph 178 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 178 of the Complaint. To the extent the allegations contained in Paragraph 178 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 178 of the Complaint, and therefore denies the same.

179. The allegations contained in Paragraph 179 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 179 of the Complaint. To the extent the allegations contained in Paragraph 179 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 179 of the Complaint, and therefore denies the same.

180. The allegations contained in Paragraph 180 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 180 of the Complaint. To the extent the allegations contained in Paragraph 180 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 180 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 180 of the Complaint, and therefore denies the same.

181. The allegations contained in Paragraph 181 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 181 of the Complaint. To the extent the allegations contained in Paragraph 181 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 181 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 181 of the Complaint, and therefore denies the same.

182. The allegations contained in Paragraph 182 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 182 of the Complaint, and therefore denies the same.

**6. Rite Aid**

183. The allegations contained in Paragraph 183 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 183 of the Complaint. To the extent the allegations contained in Paragraph 183 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 183 of the Complaint, and therefore denies the same.

184. The allegations contained in Paragraph 184 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 184 of the Complaint. To the extent the allegations contained in Paragraph 184 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 184 of the Complaint, and therefore denies the same.

185. The allegations contained in Paragraph 185 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 185 of the Complaint. To the extent the allegations contained in Paragraph 185 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 185 of the Complaint, and therefore denies the same.

186. The allegations contained in Paragraph 186 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 186 of the Complaint. To the extent the allegations contained in Paragraph 186 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 186 of the Complaint, and therefore denies the same.

187. The allegations contained in Paragraph 187 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 187 of the Complaint, and therefore denies the same.

188. The allegations contained in Paragraph 188 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 188 of the Complaint, and therefore denies the same.

189. The allegations contained in Paragraph 189 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 189 of the Complaint. To the

extent the allegations contained in Paragraph 189 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 189 of the Complaint, and therefore denies the same.

190. The allegations contained in Paragraph 190 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 190 of the Complaint. To the extent the allegations contained in Paragraph 190 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 190 of the Complaint, and therefore denies the same.

191. The allegations contained in Paragraph 191 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent they are directed at Defendant, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 191 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

192. The allegations contained in Paragraph 192 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 192 of the Complaint. To the extent the allegations contained in Paragraph 192 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 192 of the Complaint, and therefore denies the same.

193. The allegations contained in Paragraph 193 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at



Defendant, Defendant denies the allegations contained in Paragraph 193 of the Complaint. To the extent the allegations contained in Paragraph 193 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 193 of the Complaint, and therefore denies the same.

194. The allegations contained in Paragraph 194 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 194 of the Complaint. To the extent the allegations contained in Paragraph 194 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 194 of the Complaint, and therefore denies the same.

195. The allegations contained in Paragraph 195 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 195 of the Complaint. To the extent the allegations contained in Paragraph 195 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 195 of the Complaint, and therefore denies the same.

196. The allegations contained in Paragraph 196 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 196 of the Complaint. To the extent the allegations contained in Paragraph 196 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 196 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 196 of the Complaint, and therefore denies the same.

197. The allegations contained in Paragraph 197 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 197 of the Complaint. To the extent the allegations contained in Paragraph 197 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 197 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 197 of the Complaint, and therefore denies the same.

198. The allegations contained in Paragraph 198 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 198 of the Complaint. To the extent the allegations contained in Paragraph 198 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 198 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 198 of the Complaint, and therefore denies the same.

199. The allegations contained in Paragraph 199 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 199 of the Complaint. To the extent the allegations contained in Paragraph 199 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 199 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 199 of the Complaint, and therefore denies the same.

200. The allegations contained in Paragraph 200 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 200 of the Complaint. To the extent the allegations contained in Paragraph 200 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 200 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 200 of the Complaint, and therefore denies the same.

201. The allegations contained in Paragraph 201 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 201 of the Complaint. To the extent the allegations contained in Paragraph 201 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 201 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 201 of the Complaint, and therefore denies the same.

202. The allegations contained in Paragraph 202 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 202 of the Complaint. To the extent the allegations contained in Paragraph 202 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 202 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 202 of the Complaint, and therefore denies the same.

203. The allegations contained in Paragraph 203 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 203 of the Complaint. To the extent the allegations contained in Paragraph 203 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 203 of the Complaint, and therefore denies the same.

**7. Walgreens**

204. The allegations contained in Paragraph 204 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 204 of the Complaint. To the extent the allegations contained in Paragraph 204 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 204 of the Complaint, and therefore denies the same.

205. The allegations contained in Paragraph 205 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 205 of the Complaint. To the extent the allegations contained in Paragraph 205 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 205 of the Complaint, and therefore denies the same.

206. The allegations contained in Paragraph 206 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 206 of the Complaint. To the extent the allegations contained in Paragraph 206 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 206 of the Complaint, and therefore denies the same.

207. The allegations contained in Paragraph 207 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 207 of the Complaint, and therefore denies the same.

208. The allegations contained in Paragraph 208 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 208 of the Complaint. To the extent the allegations contained in Paragraph 208 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 208 of the Complaint, and therefore denies the same.

209. The allegations contained in Paragraph 209 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 209 of the Complaint. To the extent the allegations contained in Paragraph 209 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 209 of the Complaint, and therefore denies the same.

210. The allegations contained in Paragraph 210 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 210 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore

denies the same. By way of further response, Defendant admits only that Defendant is a wholesale distributor of various prescription medications (as well as over-the-counter medications) and that Defendant has distributed controlled substances, including opioids, to retail pharmacies including, at times, certain Walgreens retail pharmacy chain locations located in Cabell County and the City of Huntington only to the extent that those pharmacies and other entities are registered with the DEA and licensed in West Virginia. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 210.

211. The allegations contained in Paragraph 211 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 211 of the Complaint. To the extent the allegations contained in Paragraph 211 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 211 of the Complaint, and therefore denies the same.

212. The allegations contained in Paragraph 212 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 212 of the Complaint. To the extent the allegations contained in Paragraph 212 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 212 of the Complaint, and therefore denies the same.

213. The allegations contained in Paragraph 213 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 213 of the Complaint. To the extent the allegations contained in Paragraph 213 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 213 of the Complaint, and therefore denies the same.

214. The allegations contained in Paragraph 214 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 214 of the Complaint. To the extent the allegations contained in Paragraph 214 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 214 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 214 of the Complaint, and therefore denies the same.

215. The allegations contained in Paragraph 215 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 215 of the Complaint. To the extent the allegations contained in Paragraph 215 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 215 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 215 of the Complaint, and therefore denies the same.

216. The allegations contained in Paragraph 216 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 216 of the Complaint. To the extent the allegations contained in Paragraph 216 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 216 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 216 of the Complaint, and therefore denies the same.

217. The allegations contained in Paragraph 217 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 217 of the Complaint. To the extent the allegations contained in Paragraph 217 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 217 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 217 of the Complaint, and therefore denies the same.

218. The allegations contained in Paragraph 218 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 218 of the Complaint. To the extent the allegations contained in Paragraph 218 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 218 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 218 of the Complaint, and therefore denies the same.

219. The allegations contained in Paragraph 219 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 219 of the Complaint. To the extent the allegations contained in Paragraph 219 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 219 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant



lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 219 of the Complaint, and therefore denies the same.

220. The allegations contained in Paragraph 220 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 220 of the Complaint. To the extent the allegations contained in Paragraph 220 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 220 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 220 of the Complaint, and therefore denies the same.

221. The allegations contained in Paragraph 221 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 221 of the Complaint. To the extent the allegations contained in Paragraph 221 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 221 of the Complaint, and therefore denies the same.

**8. Kroger**

222. The allegations contained in Paragraph 222 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 222 of the Complaint. To the extent the allegations contained in Paragraph 222 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 222 of the Complaint, and therefore denies the same.

223. The allegations contained in Paragraph 223 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 223 of the Complaint. To the extent the allegations contained in Paragraph 223 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 223 of the Complaint, and therefore denies the same.

224. The allegations contained in Paragraph 224 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 224 of the Complaint. To the extent the allegations contained in Paragraph 224 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 224 of the Complaint, and therefore denies the same.

225. The allegations contained in Paragraph 225 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 225 of the Complaint, and therefore denies the same.

226. The allegations contained in Paragraph 226 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 226 of the Complaint. To the extent the allegations contained in Paragraph 226 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 226 of the Complaint, and therefore denies the same.

227. The allegations contained in Paragraph 227 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 227 of the Complaint. To the extent the allegations contained in Paragraph 227 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 227 of the Complaint, and therefore denies the same.

228. The allegations contained in Paragraph 228 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent they are directed at Defendant, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 228 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

229. The allegations contained in Paragraph 229 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 229 of the Complaint. To the extent the allegations contained in Paragraph 229 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 229 of the Complaint, and therefore denies the same.

230. The allegations contained in Paragraph 230 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 230 of the Complaint. To the extent the allegations contained in Paragraph 230 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 230 of the Complaint, and therefore denies the same.

231. The allegations contained in Paragraph 231 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 231 of the Complaint. To the extent the allegations contained in Paragraph 231 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 231 of the Complaint, and therefore denies the same.

232. The allegations contained in Paragraph 232 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 232 of the Complaint. To the extent the allegations contained in Paragraph 232 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 232 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 232 of the Complaint, and therefore denies the same.

233. The allegations contained in Paragraph 233 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 233 of the Complaint. To the extent the allegations contained in Paragraph 233 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 233 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 233 of the Complaint, and therefore denies the same.

234. The allegations contained in Paragraph 234 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 234 of the Complaint. To the extent the allegations contained in Paragraph 234 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 234 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 234 of the Complaint, and therefore denies the same.

235. The allegations contained in Paragraph 235 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 235 of the Complaint. To the extent the allegations contained in Paragraph 235 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 235 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 235 of the Complaint, and therefore denies the same.

236. The allegations contained in Paragraph 236 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 236 of the Complaint. To the extent the allegations contained in Paragraph 236 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 236 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 236 of the Complaint, and therefore denies the same.

237. The allegations contained in Paragraph 237 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 237 of the Complaint. To the extent the allegations contained in Paragraph 237 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 237 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 237 of the Complaint, and therefore denies the same.

238. The allegations contained in Paragraph 238 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 238 of the Complaint. To the extent the allegations contained in Paragraph 238 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 238 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 238 of the Complaint, and therefore denies the same.

239. The allegations contained in Paragraph 239 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 239 of the Complaint. To the extent the allegations contained in Paragraph 239 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 239 of the Complaint, and therefore denies the same.

**9. Walmart Inc.**

240. The allegations contained in Paragraph 240 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 240 of the Complaint. To the extent the allegations contained in Paragraph 240 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 240 of the Complaint, and therefore denies the same.

241. The allegations contained in Paragraph 241 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 241 of the Complaint. To the extent the allegations contained in Paragraph 241 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 241 of the Complaint, and therefore denies the same.

242. The allegations contained in Paragraph 242 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 242 of the Complaint, and therefore denies the same.

243. The allegations contained in Paragraph 243 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 243 of the Complaint. To the extent the allegations contained in Paragraph 243 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 243 of the Complaint, and therefore denies the same.

244. The allegations contained in Paragraph 244 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 244 of the Complaint. To the extent the allegations contained in Paragraph 244 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 244 of the Complaint, and therefore denies the same.

245. The allegations contained in Paragraph 245 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 245 of the Complaint. To the extent the allegations contained in Paragraph 245 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 245 of the Complaint, and therefore denies the same.

246. The allegations contained in Paragraph 246 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 246 of the Complaint. To the extent the allegations contained in Paragraph 246 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 246 of the Complaint, and therefore denies the same.

247. The allegations contained in Paragraph 247 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent they are directed at Defendant, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 247 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

248. The allegations contained in Paragraph 248 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 248 of the Complaint. To the



extent the allegations contained in Paragraph 248 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 248 of the Complaint, and therefore denies the same.

249. The allegations contained in Paragraph 249 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 249 of the Complaint. To the extent the allegations contained in Paragraph 249 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 249 of the Complaint, and therefore denies the same.

250. The allegations contained in Paragraph 250 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 250 of the Complaint. To the extent the allegations contained in Paragraph 250 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 250 of the Complaint, and therefore denies the same.

251. The allegations contained in Paragraph 251 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 251 of the Complaint. To the extent the allegations contained in Paragraph 251 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 251 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 251 of the Complaint, and therefore denies the same.

252. The allegations contained in Paragraph 252 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 252 of the Complaint. To the extent the allegations contained in Paragraph 252 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 252 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 252 of the Complaint, and therefore denies the same.

253. The allegations contained in Paragraph 253 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 253 of the Complaint. To the extent the allegations contained in Paragraph 253 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 253 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 253 of the Complaint, and therefore denies the same.

254. The allegations contained in Paragraph 254 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 254 of the Complaint. To the extent the allegations contained in Paragraph 254 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 254 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 254 of the Complaint, and therefore denies the same.

255. The allegations contained in Paragraph 255 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 255 of the Complaint. To the extent the allegations contained in Paragraph 255 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 255 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 255 of the Complaint, and therefore denies the same.

256. The allegations contained in Paragraph 256 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 256 of the Complaint. To the extent the allegations contained in Paragraph 256 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 256 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 256 of the Complaint, and therefore denies the same.

257. The allegations contained in Paragraph 257 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 257 of the Complaint. To the extent the allegations contained in Paragraph 257 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 257 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 257 of the Complaint, and therefore denies the same.

258. The allegations contained in Paragraph 258 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 258 of the Complaint. To the extent the allegations contained in Paragraph 258 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 258 of the Complaint, and therefore denies the same.

259. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 259 of the Complaint, and therefore denies the same.

260. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 260 of the Complaint, and therefore denies the same.

261. Defendant denies the allegations contained in Paragraph 261 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 261 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 261 of the Complaint set forth legal arguments and legal conclusions, no response is required.

**C. National Pharmacies**

262. The allegations contained in Paragraph 262 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 262 of the Complaint. To the extent the allegations contained in Paragraph 262 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 262 of the Complaint, and therefore denies the same.

263. The allegations contained in Paragraph 263 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 263 of the Complaint. To the extent the allegations contained in Paragraph 263 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 263 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 263 of the Complaint, and therefore denies the same.

264. The allegations contained in Paragraph 264 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 264 of the Complaint. To the extent the allegations contained in Paragraph 264 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 264 of the Complaint, and therefore denies the same.

**1. CVS**

265. The allegations contained in Paragraph 265 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 265 of the Complaint. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 265 of the Complaint, and therefore denies the same.

266. The allegations contained in Paragraph 266 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 266 of the Complaint. To the

extent the allegations contained in Paragraph 266 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 266 of the Complaint, and therefore denies the same.

267. The allegations contained in Paragraph 267 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 267 of the Complaint. To the extent the allegations contained in Paragraph 267 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 267 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 267 of the Complaint, and therefore denies the same.

## **2. Rite Aid**

268. The allegations contained in Paragraph 268 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 268 of the Complaint. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 268 of the Complaint, and therefore denies the same.

269. The allegations contained in Paragraph 269 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 269 of the Complaint. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 269 of the Complaint, and therefore denies the same.

270. The allegations contained in Paragraph 270 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 270 of the Complaint. To the extent the allegations contained in Paragraph 270 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 270 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 270 of the Complaint, and therefore denies the same.

271. The allegations contained in Paragraph 271 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 271 of the Complaint. To the extent the allegations contained in Paragraph 271 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 271 of the Complaint, and therefore denies the same.

### **3. Walgreens**

272. The allegations contained in Paragraph 272 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 272 of the Complaint. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 272 of the Complaint, and therefore denies the same.

273. The allegations contained in Paragraph 273 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 273 of the Complaint. To the

extent the allegations contained in Paragraph 273 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 273 of the Complaint, and therefore denies the same.

274. The allegations contained in Paragraph 274 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 274 of the Complaint. To the extent the allegations contained in Paragraph 274 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 274 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 274 of the Complaint, and therefore denies the same.

275. The allegations contained in Paragraph 275 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 275 of the Complaint. To the extent the allegations contained in Paragraph 275 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 275 of the Complaint, and therefore denies the same.

#### **4. Walmart**

276. The allegations contained in Paragraph 276 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 276 of the Complaint. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief



as to the truth of the allegations contained in Paragraph 276 of the Complaint, and therefore denies the same.

277. The allegations contained in Paragraph 277 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 277 of the Complaint. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 277 of the Complaint, and therefore denies the same.

278. The allegations contained in Paragraph 278 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 278 of the Complaint. To the extent the allegations contained in Paragraph 278 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 278 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 278 of the Complaint, and therefore denies the same.

279. The allegations contained in Paragraph 279 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 279 of the Complaint. To the extent the allegations contained in Paragraph 279 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 279 of the Complaint, and therefore denies the same.

## **5. Kroger**

280. The allegations contained in Paragraph 280 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 280 of the Complaint. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 280 of the Complaint, and therefore denies the same.

281. The allegations contained in Paragraph 281 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 281 of the Complaint. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 281 of the Complaint, and therefore denies the same.

282. The allegations contained in Paragraph 282 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 282 of the Complaint. To the extent the allegations contained in Paragraph 282 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 282 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 282 of the Complaint, and therefore denies the same.

283. The allegations contained in Paragraph 283 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 283 of the Complaint. To the extent the allegations contained in Paragraph 283 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 283 of the Complaint, and therefore denies the same.

**D. Pharmacy Benefit Managers**

284. The allegations contained in Paragraph 284 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 284 of the Complaint. To the extent the allegations contained in Paragraph 284 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 284 of the Complaint, and therefore denies the same.

285. The allegations contained in Paragraph 285 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 285 of the Complaint. To the extent the allegations contained in Paragraph 285 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 285 of the Complaint, and therefore denies the same.

286. The allegations contained in Paragraph 286 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 286 of the Complaint. To the extent the allegations contained in Paragraph 286 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 286 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 286 of the Complaint, and therefore denies the same.

**1. Express Scripts**

287. The allegations contained in Paragraph 287 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 287 of the Complaint. To the extent the allegations contained in Paragraph 287 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 287 of the Complaint, and therefore denies the same.

288. The allegations contained in Paragraph 288 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 288 of the Complaint. To the extent the allegations contained in Paragraph 288 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 288 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 288 of the Complaint, and therefore denies the same.

289. The allegations contained in Paragraph 289 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 289 of the Complaint. To the extent the allegations contained in Paragraph 289 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 289 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 289 of the Complaint, and therefore denies the same.

**2. CVS Caremark**

290. The allegations contained in Paragraph 290 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 290 of the Complaint. To the extent the allegations contained in Paragraph 290 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 290 of the Complaint, and therefore denies the same.

291. The allegations contained in Paragraph 291 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 291 of the Complaint, and therefore denies the same.

292. The allegations contained in Paragraph 292 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 292 of the Complaint. To the extent the allegations contained in Paragraph 292 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 292 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 292 of the Complaint, and therefore denies the same.

293. The allegations contained in Paragraph 293 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 293 of the Complaint. To the extent the allegations contained in Paragraph 293 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 293 of the Complaint, and therefore denies the same.

**3. Optum Rx**

294. The allegations contained in Paragraph 294 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 294 of the Complaint. To the extent the allegations contained in Paragraph 294 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 294 of the Complaint, and therefore denies the same.

295. The allegations contained in Paragraph 295 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 295 of the Complaint. To the extent the allegations contained in Paragraph 295 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 295 of the Complaint, and therefore denies the same.

296. The allegations contained in Paragraph 296 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 296 of the Complaint. To the extent the allegations contained in Paragraph 296 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 296 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 296 of the Complaint, and therefore denies the same.

297. The allegations contained in Paragraph 297 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 297 of the Complaint. To the extent the allegations contained in Paragraph 297 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 297 of the Complaint, and therefore denies the same.

298. The allegations contained in Paragraph 298 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 298 of the Complaint, and therefore denies the same.

299. The allegations contained in Paragraph 299 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 299 of the Complaint. To the extent the allegations contained in Paragraph 299 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 299 of the Complaint, and therefore denies the same.

**E. Agency and Authority**

300. Defendant denies the allegations contained in Paragraph 300 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 300 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 300 of the Complaint set forth legal arguments and legal conclusions, no response is required.

### **JURISDICTION AND VENUE**

301. The allegations contained in Paragraph 301 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 301 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 301 of the Complaint, and therefore denies the same.

302. The allegations contained in Paragraph 302 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 302 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 302 of the Complaint, and therefore denies the same.

303. The allegations contained in Paragraph 303 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 303 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 303 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 303 of the Complaint, and therefore denies the same.

304. Defendant denies the allegations contained in Paragraph 304 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 304 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to



form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 304 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 304 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

305. The allegations contained in Paragraph 305 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 305 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 305 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 305 of the Complaint, and therefore denies the same.

306. The allegations contained in Paragraph 306 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 306 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 306 of the Complaint, and therefore denies the same.

#### **JURY DEMAND**

307. The allegations contained in Paragraph 307 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 307 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore

denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 307 of the Complaint, and therefore denies the same.

## **FACTUAL ALLEGATIONS**

### **I. FACTS COMMON TO ALL CLAIMS**

#### **A. Defendants' Conduct Created an Abatable Public Nuisance**

308. The allegations contained in Paragraph 308 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 308 of the Complaint, and therefore denies the same.

309. Defendant denies the allegations contained in Paragraph 309 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 309 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 309 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 309.

310. Defendant denies the allegations contained in Paragraph 310 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 310 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 310 of the Complaint set forth legal arguments and legal conclusions, no response is required.

**B. Summary of the Origin of the Opioid Epidemic and Opioid Public Nuisance**

311. The allegations contained in Paragraph 311 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 311 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 311.

312. Defendant denies the allegations contained in Paragraph 312 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 312 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 312 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 312.

313. The allegations contained in Paragraph 313 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 313 of the Complaint. To the extent the allegations contained in Paragraph 313 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 313 of the Complaint, and therefore denies the same.

314. The allegations contained in Paragraph 314 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 314 of the Complaint. To the extent the allegations contained in Paragraph 314 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 314 of the Complaint, and therefore denies the same.

315. The allegations contained in Paragraph 315 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 315 of the Complaint. To the extent the allegations contained in Paragraph 315 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 315 of the Complaint, and therefore denies the same.

316. The allegations contained in Paragraph 316 of the Complaint set forth purported medical and/or expert opinions, to which no response is required. To the extent the allegations contained in Paragraph 316 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant admits only that branded and generic prescription opioids are approved by the FDA and regulated as controlled substances. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 316.

317. The allegations contained in Paragraph 317 of the Complaint set forth purported medical and/or expert opinions, to which no response is required. To the extent the allegations contained in Paragraph 317 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 317 of the Complaint, and therefore denies the same.

318. Defendant denies the allegations contained in Paragraph 318 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 318 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the

allegations contained in Paragraph 318 of the Complaint set forth legal arguments and legal conclusions, no response is required.

319. The allegations contained in Paragraph 319 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 319 of the Complaint. To the extent the allegations contained in Paragraph 319 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 319 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 319 of the Complaint, and therefore denies the same.

320. Defendant denies the allegations contained in Paragraph 320 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 320 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 320 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 320 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent Paragraph 320 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

321. The allegations contained in Paragraph 321 of the Complaint set forth purported medical and/or expert opinions, to which no response is required. To the extent the allegations contained in Paragraph 321 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 321 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant incorporates by reference

its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 321.

322. The allegations contained in Paragraph 322 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 322 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 322 of the Complaint, and therefore denies the same.

323. Defendant denies the allegations contained in Paragraph 323 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 323 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 323 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant admits only that Defendant is a wholesale distributor of various prescription medications (as well as over-the-counter medications) and that Defendant has distributed controlled substances, including opioids, to retail pharmacies and other entities located in Cabell County and the City of Huntington only to the extent that those pharmacies and other entities are registered with the DEA and licensed in West Virginia. Further, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 323.

324. The allegations contained in Paragraph 324 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 324 of the Complaint. To the extent the allegations contained in Paragraph 324 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 324 of the Complaint, and therefore denies the same.

325. Defendant denies the allegations contained in Paragraph 325 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 325 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 325 of the Complaint set forth legal arguments and legal conclusions, no response is required.

**C. Opioids and Their Effect**

326. The allegations contained in Paragraph 326 of the Complaint set forth purported medical and/or expert opinions, to which no response is required. To the extent the allegations contained in Paragraph 326 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 326 of the Complaint, and therefore denies the same.

327. The allegations contained in Paragraph 327 of the Complaint set forth purported medical and/or expert opinions, to which no response is required. To the extent the allegations contained in Paragraph 327 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 327 of the Complaint, and therefore denies the same.

328. The allegations contained in Paragraph 328 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 328 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent the allegations

contained in Paragraph 328 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 328 of the Complaint, and therefore denies the same.

329. The allegations contained in Paragraph 329 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 329 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 329 of the Complaint, and therefore denies the same.

330. The allegations contained in Paragraph 330 of the Complaint set forth purported medical and/or expert opinions, to which no response is required. To the extent the allegations contained in Paragraph 330 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 330 of the Complaint, and therefore denies the same.

331. The allegations contained in Paragraph 331 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 331 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 331 of the Complaint, and therefore denies the same.

332. The allegations contained in Paragraph 332 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 332 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent the allegations contained in Paragraph 332 of the Complaint



are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 332 of the Complaint, and therefore denies the same.

333. The allegations contained in Paragraph 333 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 333 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent the allegations contained in Paragraph 333 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 333 of the Complaint, and therefore denies the same.

334. The allegations contained in Paragraph 334 of the Complaint set forth purported medical and/or expert opinions, to which no response is required. To the extent the allegations contained in Paragraph 334 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 334 of the Complaint, and therefore denies the same.

335. The allegations contained in Paragraph 335 of the Complaint set forth purported medical and/or expert opinions, to which no response is required. To the extent the allegations contained in Paragraph 335 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 335 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 335 of the Complaint, and therefore denies the same.

336. The allegations contained in Paragraph 336 of the Complaint set forth purported medical and/or expert opinions, to which no response is required. To the extent the allegations contained in Paragraph 336 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 336 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 336 of the Complaint, and therefore denies the same.

337. The allegations contained in Paragraph 337 of the Complaint set forth purported medical and/or expert opinions, to which no response is required. To the extent the allegations contained in Paragraph 337 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 337 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 337 of the Complaint, and therefore denies the same.

338. The allegations contained in Paragraph 338 of the Complaint set forth purported medical and/or expert opinions, to which no response is required. To the extent the allegations contained in Paragraph 338 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 338 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 338 of the Complaint, and therefore denies the same.

339. The allegations contained in Paragraph 339 of the Complaint set forth purported medical and/or expert opinions, to which no response is required. To the extent the allegations contained in Paragraph 339 of the Complaint set forth legal arguments and legal conclusions, no

response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 339 of the Complaint, and therefore denies the same.

340. The allegations contained in Paragraph 340 of the Complaint set forth purported medical and/or expert opinions, to which no response is required. To the extent the allegations contained in Paragraph 340 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 340 of the Complaint, and therefore denies the same.

**D. The Resurgence of Opioid Use in the United States**

**1. The Sackler Family Integrated Advertising and Medicine**

341. The allegations contained in Paragraph 341 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 341 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent the allegations contained in Paragraph 341 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 341 of the Complaint, and therefore denies the same.

342. The allegations contained in Paragraph 342 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 342 of the Complaint. To the extent the allegations contained in Paragraph 342 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 342 of the Complaint, and therefore denies the same.

343. The allegations contained in Paragraph 343 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 343 of the Complaint. To the extent the allegations contained in Paragraph 343 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 343 of the Complaint, and therefore denies the same.

344. The allegations contained in Paragraph 344 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 344 of the Complaint. To the extent the allegations contained in Paragraph 344 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 344 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 344 of the Complaint, and therefore denies the same.

345. The allegations contained in Paragraph 345 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 345 of the Complaint. To the extent the allegations contained in Paragraph 345 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 345 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 345 of the Complaint, and therefore denies the same.

346. The allegations contained in Paragraph 346 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 346 of the Complaint. To the extent the allegations contained in Paragraph 346 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 346 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 346 of the Complaint, and therefore denies the same.

**2. Purdue and the Development of OxyContin**

347. The allegations contained in Paragraph 347 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 347 of the Complaint. To the extent the allegations contained in Paragraph 347 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 347 of the Complaint, and therefore denies the same.

348. The allegations contained in Paragraph 348 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 348 of the Complaint. To the extent the allegations contained in Paragraph 348 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 348 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 348 of the Complaint, and therefore denies the same.

349. The allegations contained in Paragraph 349 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 349 of the Complaint. To the extent the allegations contained in Paragraph 349 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 349 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 349 of the Complaint, and therefore denies the same.

350. The allegations contained in Paragraph 350 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 350 of the Complaint. To the extent the allegations contained in Paragraph 350 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 350 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 350 of the Complaint, and therefore denies the same.

351. The allegations contained in Paragraph 351 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 351 of the Complaint. To the extent the allegations contained in Paragraph 351 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 351 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 351 of the Complaint, and therefore denies the same.

352. The allegations contained in Paragraph 352 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 352 of the Complaint. To the extent the allegations contained in Paragraph 352 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 352 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 352 of the Complaint, and therefore denies the same.

353. The allegations contained in Paragraph 353 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 353 of the Complaint. To the extent the allegations contained in Paragraph 353 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 353 of the Complaint, and therefore denies the same.

354. The allegations contained in Paragraph 354 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 354 of the Complaint. To the extent the allegations contained in Paragraph 354 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 354 of the Complaint, and therefore denies the same.

355. The allegations contained in Paragraph 355 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 355 of the Complaint. To the extent the allegations contained in Paragraph 355 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 355 of the Complaint, and therefore denies the same.

356. The allegations contained in Paragraph 356 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 356 of the Complaint. To the extent the allegations contained in Paragraph 356 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 356 of the Complaint, and therefore denies the same.

357. The allegations contained in Paragraph 357 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 357 of the Complaint. To the extent the allegations contained in Paragraph 357 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 357 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 357 of the Complaint, and therefore denies the same.

358. The allegations contained in Paragraph 358 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 358 of the Complaint. To the extent the allegations contained in Paragraph 358 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 358 of the Complaint, and therefore denies the same.



**3. Other Marketing Defendants Leapt at the Opioid Opportunity**

359. The allegations contained in Paragraph 359 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 359 of the Complaint. To the extent the allegations contained in Paragraph 359 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 359 of the Complaint, and therefore denies the same.

360. The allegations contained in Paragraph 360 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 360 of the Complaint. To the extent the allegations contained in Paragraph 360 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 360 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 360 of the Complaint, and therefore denies the same.

361. The allegations contained in Paragraph 361 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 361 of the Complaint. To the extent the allegations contained in Paragraph 361 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 361 of the Complaint, and therefore denies the same.

362. The allegations contained in Paragraph 362 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 362 of the Complaint. To the

extent the allegations contained in Paragraph 362 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 362 of the Complaint, and therefore denies the same.

363. The allegations contained in Paragraph 363 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 363 of the Complaint. To the extent the allegations contained in Paragraph 363 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 363 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 363 of the Complaint, and therefore denies the same.

364. The allegations contained in Paragraph 364 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 364 of the Complaint. To the extent the allegations contained in Paragraph 364 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 364 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 364 of the Complaint, and therefore denies the same.

365. The allegations contained in Paragraph 365 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 365 of the Complaint. To the extent the allegations contained in Paragraph 365 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 365 of the Complaint, and therefore denies the same.

366. The allegations contained in Paragraph 366 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 366 of the Complaint. To the extent the allegations contained in Paragraph 366 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 366 of the Complaint, and therefore denies the same.

367. The allegations contained in Paragraph 367 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 367 of the Complaint. To the extent the allegations contained in Paragraph 367 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 367 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 367 of the Complaint, and therefore denies the same.

368. The allegations contained in Paragraph 368 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 368 of the Complaint. To the extent the allegations contained in Paragraph 368 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 368 of the Complaint, and therefore denies the same.

369. The allegations contained in Paragraph 369 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 369 of the Complaint. To the extent the allegations contained in Paragraph 369 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 369 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 369 of the Complaint, and therefore denies the same.

370. The allegations contained in Paragraph 370 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 370 of the Complaint. To the extent the allegations contained in Paragraph 370 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 370 of the Complaint, and therefore denies the same.

371. The allegations contained in Paragraph 371 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 371 of the Complaint. To the extent the allegations contained in Paragraph 371 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 371 of the Complaint, and therefore denies the same.

**E. The Marketing Defendants' Multi-Pronged Scheme to Change Prescriber Habits and Public Perception and Increase Demand for Opioids**

372. The allegations contained in Paragraph 372 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 372 of the Complaint. To the extent the allegations contained in Paragraph 372 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent the allegations contained in Paragraph 372 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 372 of the Complaint, and therefore denies the same.

373. The allegations contained in Paragraph 373 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 373 of the Complaint. To the extent the allegations contained in Paragraph 373 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 373 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 373 of the Complaint, and therefore denies the same.

374. The allegations contained in Paragraph 374 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 374 of the Complaint. To the extent the allegations contained in Paragraph 374 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 374 of the Complaint, and therefore denies the same.

375. The allegations contained in Paragraph 375 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 375 of the Complaint. To the extent the allegations contained in Paragraph 375 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 375 of the Complaint, and therefore denies the same.

376. The allegations contained in Paragraph 376 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 376 of the Complaint. To the extent the allegations contained in Paragraph 376 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 376 of the Complaint, and therefore denies the same.

377. The allegations contained in Paragraph 377 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 377 of the Complaint. To the extent the allegations contained in Paragraph 377 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 377 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 377 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 377 of the Complaint, and therefore denies the same.

378. The allegations contained in Paragraph 378 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 378 of the Complaint. To the extent the allegations contained in Paragraph 378 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 378 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 378 of the Complaint, and therefore denies the same.

**1. The Marketing Defendants Promoted Multiple Falsehoods About Opioids**

379. The allegations contained in Paragraph 379 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 379 of the Complaint. To the extent the allegations contained in Paragraph 379 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 379 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 379 of the Complaint, and therefore denies the same.

380. The allegations contained in Paragraph 380 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 380 of the Complaint. To the extent the allegations contained in Paragraph 380 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 380 of the Complaint, and therefore denies the same.

381. The allegations contained in Paragraph 381 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 381 of the Complaint. To the extent the allegations contained in Paragraph 381 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 381 of the Complaint, and therefore denies the same.

382. The allegations contained in Paragraph 382 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 382 of the Complaint. To the extent the allegations contained in Paragraph 382 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 382 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 382 of the Complaint, and therefore denies the same.

383. The allegations contained in Paragraph 383 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 383 of the Complaint. To the extent the allegations contained in Paragraph 383 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 383 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 383 of the Complaint, and therefore denies the same.

384. The allegations contained in Paragraph 384 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 384 of the Complaint. To the extent the allegations contained in Paragraph 384 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 384 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 384 of the Complaint, and therefore denies the same.



385. The allegations contained in Paragraph 385 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 385 of the Complaint. To the extent the allegations contained in Paragraph 385 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 385 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 385 of the Complaint, and therefore denies the same.

386. The allegations contained in Paragraph 386 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 386 of the Complaint. To the extent the allegations contained in Paragraph 386 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 386 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 386 of the Complaint, and therefore denies the same.

387. The allegations contained in Paragraph 387 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 387 of the Complaint. To the extent the allegations contained in Paragraph 387 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 387 of the Complaint, and therefore denies the same.

Falsehood #1: The risk of addiction from chronic opioid therapy is low

388. The allegations contained in Paragraph 388 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 388 of the Complaint. To the extent the allegations contained in Paragraph 388 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 388 of the Complaint, and therefore denies the same.

389. The allegations contained in Paragraph 389 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 389 of the Complaint. To the extent the allegations contained in Paragraph 389 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 389 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 389 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 389 of the Complaint, and therefore denies the same.

**i. Purdue's misrepresentations regarding addiction risk**

390. The allegations contained in Paragraph 390 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 390 of the Complaint. To the extent the allegations contained in Paragraph 390 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 390 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 390 of the Complaint, and therefore denies the same.

391. The allegations contained in Paragraph 391 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 391 of the Complaint. To the extent the allegations contained in Paragraph 391 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 391 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 391 of the Complaint, and therefore denies the same.

392. The allegations contained in Paragraph 392 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 392 of the Complaint. To the extent the allegations contained in Paragraph 392 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 392 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 392 of the Complaint, and therefore denies the same.

393. The allegations contained in Paragraph 393 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 393 of the Complaint. To the extent the allegations contained in Paragraph 393 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 393 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 393 of the Complaint, and therefore denies the same.

394. The allegations contained in Paragraph 394 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 394 of the Complaint. To the extent the allegations contained in Paragraph 394 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 394 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 394 of the Complaint, and therefore denies the same.

395. The allegations contained in Paragraph 395 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 395 of the Complaint. To the extent the allegations contained in Paragraph 395 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 395 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 395 of the Complaint, and therefore denies the same.

396. The allegations contained in Paragraph 396 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 396 of the Complaint. To the extent the allegations contained in Paragraph 396 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 396 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 396 of the Complaint, and therefore denies the same.

397. The allegations contained in Paragraph 397 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 397 of the Complaint. To the extent the allegations contained in Paragraph 397 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 397 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 397 of the Complaint, and therefore denies the same.

398. The allegations contained in Paragraph 398 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 398 of the Complaint. To the extent the allegations contained in Paragraph 398 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 398 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 398 of the Complaint, and therefore denies the same.

399. The allegations contained in Paragraph 399 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 399 of the Complaint. To the extent the allegations contained in Paragraph 399 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 399 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 399 of the Complaint, and therefore denies the same.

400. The allegations contained in Paragraph 400 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 400 of the Complaint. To the extent the allegations contained in Paragraph 400 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 400 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 400 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 400 of the Complaint, and therefore denies the same.

401. The allegations contained in Paragraph 401 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 401 of the Complaint. To the extent the allegations contained in Paragraph 401 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 401 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 401 of the Complaint, and therefore denies the same.

402. The allegations contained in Paragraph 402 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 402 of the Complaint. To the extent the allegations contained in Paragraph 402 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 402 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 402 of the Complaint, and therefore denies the same.

403. The allegations contained in Paragraph 403 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 403 of the Complaint. To the extent the allegations contained in Paragraph 403 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 403 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 403 of the Complaint, and therefore denies the same.

404. The allegations contained in Paragraph 404 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 404 of the Complaint. To the extent the allegations contained in Paragraph 404 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 404 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 404 of the Complaint, and therefore denies the same.

405. The allegations contained in Paragraph 405 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 405 of the Complaint. To the extent the allegations contained in Paragraph 405 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 405 of the Complaint, and therefore denies the same.

406. The allegations contained in Paragraph 406 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 406 of the Complaint. To the extent the allegations contained in Paragraph 406 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 406 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 406 of the Complaint, and therefore denies the same.

407. The allegations contained in Paragraph 407 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 407 of the Complaint. To the extent the allegations contained in Paragraph 407 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 407 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 407 of the Complaint, and therefore denies the same.

408. The allegations contained in Paragraph 408 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 408 of the Complaint. To the extent the allegations contained in Paragraph 408 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 408 of the Complaint, and therefore denies the same.



409. The allegations contained in Paragraph 409 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 409 of the Complaint. To the extent the allegations contained in Paragraph 409 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 409 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 409 of the Complaint, and therefore denies the same.

410. The allegations contained in Paragraph 410 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 410 of the Complaint. To the extent the allegations contained in Paragraph 410 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 410 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 410 of the Complaint, and therefore denies the same.

**ii. Endo's misrepresentations regarding addiction risk**

411. The allegations contained in Paragraph 411 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 411 of the Complaint. To the extent the allegations contained in Paragraph 411 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 411 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form

a belief as to the truth of the allegations contained in Paragraph 411 of the Complaint, and therefore denies the same.

412. The allegations contained in Paragraph 412 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 412 of the Complaint. To the extent the allegations contained in Paragraph 412 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 412 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 412 of the Complaint, and therefore denies the same.

413. The allegations contained in Paragraph 413 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 413 of the Complaint. To the extent the allegations contained in Paragraph 413 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 413 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 413 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 413 of the Complaint, and therefore denies the same.

414. The allegations contained in Paragraph 414 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 414 of the Complaint. To the extent the allegations contained in Paragraph 414 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 414 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 414 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 414 of the Complaint, and therefore denies the same.

415. The allegations contained in Paragraph 415 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 415 of the Complaint. To the extent the allegations contained in Paragraph 415 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 415 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 415 of the Complaint, and therefore denies the same.

416. The allegations contained in Paragraph 416 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 416 of the Complaint. To the extent the allegations contained in Paragraph 416 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 416 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 416 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 416 of the Complaint, and therefore denies the same.

417. The allegations contained in Paragraph 417 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 417 of the Complaint. To the extent the allegations contained in Paragraph 417 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 417 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 417 of the Complaint, and therefore denies the same.

418. The allegations contained in Paragraph 418 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 418 of the Complaint. To the extent the allegations contained in Paragraph 418 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 418 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 418 of the Complaint, and therefore denies the same.

**iii. Janssen's misrepresentations regarding addiction risk**

419. The allegations contained in Paragraph 419 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 419 of the Complaint. To the extent the allegations contained in Paragraph 419 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 419 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in

Paragraph 419 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 419 of the Complaint, and therefore denies the same.

420. The allegations contained in Paragraph 420 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 420 of the Complaint. To the extent the allegations contained in Paragraph 420 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 420 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 420 of the Complaint, and therefore denies the same.

421. The allegations contained in Paragraph 421 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 421 of the Complaint. To the extent the allegations contained in Paragraph 421 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 421 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 421 of the Complaint, and therefore denies the same.

422. The allegations contained in Paragraph 422 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 422 of the Complaint. To the extent the allegations contained in Paragraph 422 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 422 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 422 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 422 of the Complaint, and therefore denies the same.

423. The allegations contained in Paragraph 423 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 423 of the Complaint. To the extent the allegations contained in Paragraph 423 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 423 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 423 of the Complaint, and therefore denies the same.

424. The allegations contained in Paragraph 424 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 424 of the Complaint. To the extent the allegations contained in Paragraph 424 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 424 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 424 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 424 of the Complaint, and therefore denies the same.

425. The allegations contained in Paragraph 425 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 425 of the Complaint. To the extent the allegations contained in Paragraph 425 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 425 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 425 of the Complaint, and therefore denies the same.

426. The allegations contained in Paragraph 426 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 426 of the Complaint. To the extent the allegations contained in Paragraph 426 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 426 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 426 of the Complaint, and therefore denies the same.

427. The allegations contained in Paragraph 427 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 427 of the Complaint. To the extent the allegations contained in Paragraph 427 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 427 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 427 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or

information to form a belief as to the truth of the allegations contained in Paragraph 427 of the Complaint, and therefore denies the same.

**iv. Cephalon's misrepresentations regarding addiction risk**

428. The allegations contained in Paragraph 428 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 428 of the Complaint. To the extent the allegations contained in Paragraph 428 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 428 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 428 of the Complaint, and therefore denies the same.

429. The allegations contained in Paragraph 429 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 429 of the Complaint. To the extent the allegations contained in Paragraph 429 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 429 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 429 of the Complaint, and therefore denies the same.

430. The allegations contained in Paragraph 430 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 430 of the Complaint. To the extent the allegations contained in Paragraph 430 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 430 of the Complaint purports



to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 430 of the Complaint, and therefore denies the same.

**v. Actavis's misrepresentations regarding addiction risk**

431. The allegations contained in Paragraph 431 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 431 of the Complaint. To the extent the allegations contained in Paragraph 431 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 431 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 431 of the Complaint, and therefore denies the same.

432. The allegations contained in Paragraph 432 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 432 of the Complaint. To the extent the allegations contained in Paragraph 432 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 432 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 432 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 432 of the Complaint, and therefore denies the same.

433. The allegations contained in Paragraph 433 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 433 of the Complaint. To the extent the allegations contained in Paragraph 433 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 433 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 433 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 433 of the Complaint, and therefore denies the same.

434. The allegations contained in Paragraph 434 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 434 of the Complaint. To the extent the allegations contained in Paragraph 434 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 434 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 434 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 434 of the Complaint, and therefore denies the same.

**vi. Mallinckrodt's misrepresentations regarding addiction risk**

435. The allegations contained in Paragraph 435 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 435 of the Complaint. To the

extent the allegations contained in Paragraph 435 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 435 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 435 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 435 of the Complaint, and therefore denies the same.

436. The allegations contained in Paragraph 436 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 436 of the Complaint. To the extent the allegations contained in Paragraph 436 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 436 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 436 of the Complaint, and therefore denies the same.

437. The allegations contained in Paragraph 437 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 437 of the Complaint. To the extent the allegations contained in Paragraph 437 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 437 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 437 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or

information to form a belief as to the truth of the allegations contained in Paragraph 437 of the Complaint, and therefore denies the same.

438. The allegations contained in Paragraph 438 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 438 of the Complaint. To the extent the allegations contained in Paragraph 438 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 438 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 438 of the Complaint, and therefore denies the same.

439. The allegations contained in Paragraph 439 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 439 of the Complaint. To the extent the allegations contained in Paragraph 439 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 439 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 439 of the Complaint, and therefore denies the same.

440. The allegations contained in Paragraph 440 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 440 of the Complaint. To the extent the allegations contained in Paragraph 440 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 440 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in

Paragraph 440 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 440 of the Complaint, and therefore denies the same.

Falsehood #2: Signs of addiction are “psuedoaddiction,” requiring more opioids

441. The allegations contained in Paragraph 441 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 441 of the Complaint. To the extent the allegations contained in Paragraph 441 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 441 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 441 of the Complaint, and therefore denies the same.

442. Defendant denies the allegations contained in Paragraph 442 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 442 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 442 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 442 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

443. Defendant denies the allegations contained in Paragraph 443 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 443 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 443 of the Complaint set forth legal arguments and legal

conclusions, no response is required. To the extent Paragraph 443 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

444. The allegations contained in Paragraph 444 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 444 of the Complaint. To the extent the allegations contained in Paragraph 444 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 444 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 444 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 444 of the Complaint, and therefore denies the same.

445. The allegations contained in Paragraph 445 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 445 of the Complaint. To the extent the allegations contained in Paragraph 445 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 445 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 445 of the Complaint, and therefore denies the same.

446. The allegations contained in Paragraph 446 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 446 of the Complaint. To the extent the allegations contained in Paragraph 446 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent Paragraph 446 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 446 of the Complaint, and therefore denies the same.

447. The allegations contained in Paragraph 447 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 447 of the Complaint. To the extent the allegations contained in Paragraph 447 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 447 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 447 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 447 of the Complaint, and therefore denies the same.

448. The allegations contained in Paragraph 448 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 448 of the Complaint. To the extent the allegations contained in Paragraph 448 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 448 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 448 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 448 of the Complaint, and therefore denies the same.

449. The allegations contained in Paragraph 449 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 449 of the Complaint. To the extent the allegations contained in Paragraph 449 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 449 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 449 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 449 of the Complaint, and therefore denies the same.

Falsehood #3: To the extent there is a risk of addiction, it can be easily identified and managed

450. The allegations contained in Paragraph 450 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 450 of the Complaint. To the extent the allegations contained in Paragraph 450 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 450 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 450 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 450 of the Complaint, and therefore denies the same.

451. The allegations contained in Paragraph 451 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 451 of the Complaint. To the extent the allegations contained in Paragraph 451 of the Complaint set forth legal arguments and



legal conclusions, no response is required. To the extent Paragraph 451 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 451 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 451 of the Complaint, and therefore denies the same.

452. The allegations contained in Paragraph 452 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 452 of the Complaint. To the extent the allegations contained in Paragraph 452 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 452 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 452 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 452 of the Complaint, and therefore denies the same.

453. The allegations contained in Paragraph 453 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 453 of the Complaint. To the extent the allegations contained in Paragraph 453 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 453 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 453 of the Complaint, and therefore denies the same.

454. The allegations contained in Paragraph 454 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 454 of the Complaint. To the extent the allegations contained in Paragraph 454 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 454 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 454 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 454 of the Complaint, and therefore denies the same.

455. The allegations contained in Paragraph 455 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 455 of the Complaint. To the extent the allegations contained in Paragraph 455 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 455 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 455 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 455 of the Complaint, and therefore denies the same.

456. The allegations contained in Paragraph 456 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 456 of the Complaint. To the extent the allegations contained in Paragraph 456 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 456 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 456 of the Complaint, and therefore denies the same.

457. The allegations contained in Paragraph 457 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 457 of the Complaint. To the extent the allegations contained in Paragraph 457 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 457 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 457 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 457 of the Complaint, and therefore denies the same.

Falsehood #4: Opioid withdrawal can be avoided by tapering

458. The allegations contained in Paragraph 458 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 458 of the Complaint. To the extent the allegations contained in Paragraph 458 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 458 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 458 of the Complaint, and therefore denies the same.

459. The allegations contained in Paragraph 459 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 459 of the Complaint. To the extent the allegations contained in Paragraph 459 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 459 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 459 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 459 of the Complaint, and therefore denies the same.

460. The allegations contained in Paragraph 460 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 460 of the Complaint. To the extent the allegations contained in Paragraph 460 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 460 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 460 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 460 of the Complaint, and therefore denies the same.

461. The allegations contained in Paragraph 461 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 461 of the Complaint. To the extent the allegations contained in Paragraph 461 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 461 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in

Paragraph 461 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 461 of the Complaint, and therefore denies the same.

462. The allegations contained in Paragraph 462 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 462 of the Complaint. To the extent the allegations contained in Paragraph 462 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 462 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 462 of the Complaint, and therefore denies the same.

463. The allegations contained in Paragraph 463 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 463 of the Complaint. To the extent the allegations contained in Paragraph 463 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 463 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 463 of the Complaint, and therefore denies the same.

464. The allegations contained in Paragraph 464 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 464 of the Complaint. To the extent the allegations contained in Paragraph 464 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 464 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 464 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 464 of the Complaint, and therefore denies the same.

465. The allegations contained in Paragraph 465 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 465 of the Complaint. To the extent the allegations contained in Paragraph 465 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 465 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 465 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 465 of the Complaint, and therefore denies the same.

466. The allegations contained in Paragraph 466 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 466 of the Complaint. To the extent the allegations contained in Paragraph 466 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 466 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 466 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or

information to form a belief as to the truth of the allegations contained in Paragraph 466 of the Complaint, and therefore denies the same.

467. The allegations contained in Paragraph 467 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 467 of the Complaint. To the extent the allegations contained in Paragraph 467 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 467 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 467 of the Complaint, and therefore denies the same.

468. The allegations contained in Paragraph 468 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 468 of the Complaint. To the extent the allegations contained in Paragraph 468 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 468 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 468 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 468 of the Complaint, and therefore denies the same.

469. The allegations contained in Paragraph 469 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 469 of the Complaint. To the extent the allegations contained in Paragraph 469 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 469 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 469 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 469 of the Complaint, and therefore denies the same.

470. The allegations contained in Paragraph 470 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 470 of the Complaint. To the extent the allegations contained in Paragraph 470 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 470 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 470 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 470 of the Complaint, and therefore denies the same.

471. The allegations contained in Paragraph 471 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 471 of the Complaint. To the extent the allegations contained in Paragraph 471 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 471 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 471 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or



information to form a belief as to the truth of the allegations contained in Paragraph 471 of the Complaint, and therefore denies the same.

472. The allegations contained in Paragraph 472 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 472 of the Complaint. To the extent the allegations contained in Paragraph 472 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 472 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 472 of the Complaint, and therefore denies the same.

473. The allegations contained in Paragraph 473 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 473 of the Complaint. To the extent the allegations contained in Paragraph 473 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 473 of the Complaint, and therefore denies the same.

474. The allegations contained in Paragraph 474 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 474 of the Complaint. To the extent the allegations contained in Paragraph 474 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 474 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 474 of the Complaint, and therefore denies the same.

475. The allegations contained in Paragraph 475 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 475 of the Complaint. To the extent the allegations contained in Paragraph 475 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 475 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 475 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 475 of the Complaint, and therefore denies the same.

476. The allegations contained in Paragraph 476 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 476 of the Complaint. To the extent the allegations contained in Paragraph 476 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 476 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 476 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 476 of the Complaint, and therefore denies the same.

Falsehood #5: Long-term opioid use improves functioning

477. The allegations contained in Paragraph 477 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 477 of the Complaint. To the extent the allegations contained in Paragraph 477 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent the allegations contained in Paragraph 477 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 477 of the Complaint, and therefore denies the same.

478. The allegations contained in Paragraph 478 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 478 of the Complaint. To the extent the allegations contained in Paragraph 478 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 478 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 478 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 478 of the Complaint, and therefore denies the same.

479. The allegations contained in Paragraph 479 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 479 of the Complaint. To the extent the allegations contained in Paragraph 479 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 479 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 479 of the Complaint, and therefore denies the same.

480. The allegations contained in Paragraph 480 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 480 of the Complaint. To the extent the allegations contained in Paragraph 480 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 480 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 480 of the Complaint, and therefore denies the same.

481. The allegations contained in Paragraph 481 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 481 of the Complaint. To the extent the allegations contained in Paragraph 481 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 481 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 481 of the Complaint, and therefore denies the same.

482. The allegations contained in Paragraph 482 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 482 of the Complaint. To the extent the allegations contained in Paragraph 482 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 482 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 482 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 482 of the Complaint, and therefore denies the same.

483. The allegations contained in Paragraph 483 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 483 of the Complaint. To the extent the allegations contained in Paragraph 483 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 483 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 483 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 483 of the Complaint, and therefore denies the same.

Falsehood #6: Alternative forms of pain relief pose greater risks than opioids

484. Defendant denies the allegations contained in Paragraph 484 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 484 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 484 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 484 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 484 of the Complaint set forth purported medical and/or expert opinions, no response is required.

485. The allegations contained in Paragraph 485 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 485 of the Complaint. To the extent the allegations contained in Paragraph 485 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 485 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 485 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 485 of the Complaint, and therefore denies the same.

486. The allegations contained in Paragraph 486 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 486 of the Complaint. To the extent the allegations contained in Paragraph 486 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 486 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 486 of the Complaint, and therefore denies the same.

487. The allegations contained in Paragraph 487 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 487 of the Complaint. To the extent the allegations contained in Paragraph 487 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 487 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 487 of the Complaint, and therefore denies the same.

488. The allegations contained in Paragraph 488 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 488 of the Complaint. To the

extent the allegations contained in Paragraph 488 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 488 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 488 of the Complaint, and therefore denies the same.

489. The allegations contained in Paragraph 489 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 489 of the Complaint. To the extent the allegations contained in Paragraph 489 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 489 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 489 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 489 of the Complaint, and therefore denies the same.

490. The allegations contained in Paragraph 490 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 490 of the Complaint. To the extent the allegations contained in Paragraph 490 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 490 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 490 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or

information to form a belief as to the truth of the allegations contained in Paragraph 490 of the Complaint, and therefore denies the same.

491. The allegations contained in Paragraph 491 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 491 of the Complaint. To the extent the allegations contained in Paragraph 491 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 491 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 491 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 491 of the Complaint, and therefore denies the same.

Falsehood #7: Opioid doses can be increased without limit or greater risks

492. The allegations contained in Paragraph 492 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 492 of the Complaint. To the extent the allegations contained in Paragraph 492 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 492 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 492 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 492 of the Complaint, and therefore denies the same.

493. The allegations contained in Paragraph 493 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at



Defendant, Defendant denies the allegations contained in Paragraph 493 of the Complaint. To the extent the allegations contained in Paragraph 493 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 493 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 493 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 493 of the Complaint, and therefore denies the same.

494. The allegations contained in Paragraph 494 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 494 of the Complaint. To the extent the allegations contained in Paragraph 494 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 494 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 494 of the Complaint, and therefore denies the same.

495. The allegations contained in Paragraph 495 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 495 of the Complaint. To the extent the allegations contained in Paragraph 495 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 495 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 495 of the Complaint, and therefore denies the same.

496. The allegations contained in Paragraph 496 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 496 of the Complaint. To the extent the allegations contained in Paragraph 496 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 496 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 496 of the Complaint, and therefore denies the same.

497. The allegations contained in Paragraph 497 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 497 of the Complaint. To the extent the allegations contained in Paragraph 497 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 497 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 497 of the Complaint, and therefore denies the same.

498. The allegations contained in Paragraph 498 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 498 of the Complaint. To the extent the allegations contained in Paragraph 498 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 498 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 498 of the Complaint, and therefore denies the same.

499. The allegations contained in Paragraph 499 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 499 of the Complaint. To the extent the allegations contained in Paragraph 499 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 499 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 499 of the Complaint, and therefore denies the same.

500. The allegations contained in Paragraph 500 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 500 of the Complaint. To the extent the allegations contained in Paragraph 500 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 500 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 500 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 500 of the Complaint, and therefore denies the same.

501. The allegations contained in Paragraph 501 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 501 of the Complaint. To the extent the allegations contained in Paragraph 501 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 501 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in

Paragraph 501 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 501 of the Complaint, and therefore denies the same.

Falsehood #8: OxyContin provides twelve hours of pain relief

502. The allegations contained in Paragraph 502 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 502 of the Complaint. To the extent the allegations contained in Paragraph 502 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 502 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 502 of the Complaint, and therefore denies the same.

503. The allegations contained in Paragraph 503 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 503 of the Complaint. To the extent the allegations contained in Paragraph 503 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 503 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 503 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 503 of the Complaint, and therefore denies the same.

504. The allegations contained in Paragraph 504 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 504 of the Complaint. To the extent the allegations contained in Paragraph 504 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 504 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 504 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 504 of the Complaint, and therefore denies the same.

505. The allegations contained in Paragraph 505 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 505 of the Complaint. To the extent the allegations contained in Paragraph 505 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 505 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 505 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 505 of the Complaint, and therefore denies the same.

506. The allegations contained in Paragraph 506 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 506 of the Complaint. To the extent the allegations contained in Paragraph 506 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 506 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in

Paragraph 506 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 506 of the Complaint, and therefore denies the same.

507. The allegations contained in Paragraph 507 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 507 of the Complaint. To the extent the allegations contained in Paragraph 507 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 507 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 507 of the Complaint, and therefore denies the same.

508. The allegations contained in Paragraph 508 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 508 of the Complaint. To the extent the allegations contained in Paragraph 508 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 508 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 508 of the Complaint, and therefore denies the same.

509. The allegations contained in Paragraph 509 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 509 of the Complaint. To the extent the allegations contained in Paragraph 509 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 509 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 509 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 509 of the Complaint, and therefore denies the same.

510. The allegations contained in Paragraph 510 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 510 of the Complaint. To the extent the allegations contained in Paragraph 510 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 510 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 510 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 510 of the Complaint, and therefore denies the same.

Falsehood #9: New formulations of certain opioids successfully deter abuse

511. The allegations contained in Paragraph 511 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 511 of the Complaint. To the extent the allegations contained in Paragraph 511 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 511 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 511 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or

information to form a belief as to the truth of the allegations contained in Paragraph 511 of the Complaint, and therefore denies the same.

Purdue's Deceptive Marketing of Reformulated OxyContin and Hysingla ER.

512. The allegations contained in Paragraph 512 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 512 of the Complaint. To the extent the allegations contained in Paragraph 512 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 512 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 512 of the Complaint, and therefore denies the same.

513. The allegations contained in Paragraph 513 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 513 of the Complaint. To the extent the allegations contained in Paragraph 513 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 513 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 513 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 513 of the Complaint, and therefore denies the same.

514. The allegations contained in Paragraph 514 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 514 of the Complaint. To the extent the allegations contained in Paragraph 514 of the Complaint set forth legal arguments and



legal conclusions, no response is required. To the extent Paragraph 514 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 514 of the Complaint, and therefore denies the same.

515. The allegations contained in Paragraph 515 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 515 of the Complaint. To the extent the allegations contained in Paragraph 515 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 515 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 515 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 515 of the Complaint, and therefore denies the same.

516. The allegations contained in Paragraph 516 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 516 of the Complaint. To the extent the allegations contained in Paragraph 516 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 516 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 516 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 516 of the Complaint, and therefore denies the same.

517. The allegations contained in Paragraph 517 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 517 of the Complaint. To the extent the allegations contained in Paragraph 517 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 517 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 517 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 517 of the Complaint, and therefore denies the same.

518. The allegations contained in Paragraph 518 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 518 of the Complaint. To the extent the allegations contained in Paragraph 518 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 518 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 518 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 518 of the Complaint, and therefore denies the same.

519. The allegations contained in Paragraph 519 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 519 of the Complaint. To the extent the allegations contained in Paragraph 519 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 519 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 519 of the Complaint, and therefore denies the same.

520. The allegations contained in Paragraph 520 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 520 of the Complaint. To the extent the allegations contained in Paragraph 520 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 520 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 520 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 520 of the Complaint, and therefore denies the same.

521. The allegations contained in Paragraph 521 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 521 of the Complaint. To the extent the allegations contained in Paragraph 521 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 521 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 521 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 521 of the Complaint, and therefore denies the same.

Endo's Deceptive Marketing of Reformulated Opana ER.

522. The allegations contained in Paragraph 522 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 522 of the Complaint. To the extent the allegations contained in Paragraph 522 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 522 of the Complaint, and therefore denies the same.

523. The allegations contained in Paragraph 523 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 523 of the Complaint. To the extent the allegations contained in Paragraph 523 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 523 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 523 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 523 of the Complaint, and therefore denies the same.

524. The allegations contained in Paragraph 524 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 524 of the Complaint. To the extent the allegations contained in Paragraph 524 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 524 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 524 of the Complaint, and therefore denies the same.

525. The allegations contained in Paragraph 525 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 525 of the Complaint. To the extent the allegations contained in Paragraph 525 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 525 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 525 of the Complaint, and therefore denies the same.

526. The allegations contained in Paragraph 526 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 526 of the Complaint. To the extent the allegations contained in Paragraph 526 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 526 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 526 of the Complaint, and therefore denies the same.

527. The allegations contained in Paragraph 527 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 527 of the Complaint. To the extent the allegations contained in Paragraph 527 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 527 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in

Paragraph 527 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 527 of the Complaint, and therefore denies the same.

528. The allegations contained in Paragraph 528 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 528 of the Complaint. To the extent the allegations contained in Paragraph 528 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 528 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 528 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 528 of the Complaint, and therefore denies the same.

529. The allegations contained in Paragraph 529 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 529 of the Complaint. To the extent the allegations contained in Paragraph 529 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 529 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 529 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 529 of the Complaint, and therefore denies the same.

530. The allegations contained in Paragraph 530 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 530 of the Complaint. To the extent the allegations contained in Paragraph 530 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 530 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 530 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 530 of the Complaint, and therefore denies the same.

531. The allegations contained in Paragraph 531 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 531 of the Complaint. To the extent Paragraph 531 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 531 of the Complaint, and therefore denies the same.

532. The allegations contained in Paragraph 532 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 532 of the Complaint. To the extent the allegations contained in Paragraph 532 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 532 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 532 of the Complaint, and therefore denies the same.

Other Marketing Defendants' Misrepresentations Regarding Abuse Deterrence.

533. The allegations contained in Paragraph 533 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 533 of the Complaint. To the extent the allegations contained in Paragraph 533 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 533 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 533 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 533 of the Complaint, and therefore denies the same.

534. The allegations contained in Paragraph 534 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 534 of the Complaint. To the extent the allegations contained in Paragraph 534 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 534 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 534 of the Complaint, and therefore denies the same.

535. The allegations contained in Paragraph 535 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 535 of the Complaint. To the extent the allegations contained in Paragraph 535 of the Complaint set forth legal arguments and



legal conclusions, no response is required. To the extent Paragraph 535 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 535 of the Complaint, and therefore denies the same.

536. The allegations contained in Paragraph 536 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 536 of the Complaint. To the extent the allegations contained in Paragraph 536 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 536 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 536 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 536 of the Complaint, and therefore denies the same.

537. The allegations contained in Paragraph 537 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 537 of the Complaint. To the extent the allegations contained in Paragraph 537 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 537 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 537 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 537 of the Complaint, and therefore denies the same.

**2. The Marketing Defendants Disseminated Their Misleading Messages about Opioids Through Multiple Channels**

538. The allegations contained in Paragraph 538 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 538 of the Complaint. To the extent the allegations contained in Paragraph 538 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 538 of the Complaint, and therefore denies the same.

539. The allegations contained in Paragraph 539 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 539 of the Complaint. To the extent the allegations contained in Paragraph 539 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 539 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 539 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 539 of the Complaint, and therefore denies the same.

**i. The Marketing Defendants Directed Front Groups to Deceptively Promote Opioids Use**

540. Defendant denies the allegations contained in Paragraph 540 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 540 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 540 of the Complaint set forth legal arguments and legal

conclusions, no response is required. To the extent Paragraph 540 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 540 of the Complaint set forth purported medical and/or expert opinions, no response is required.

541. The allegations contained in Paragraph 541 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 541 of the Complaint. To the extent the allegations contained in Paragraph 541 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 541 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 541 of the Complaint, and therefore denies the same.

542. The allegations contained in Paragraph 542 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 542 of the Complaint. To the extent the allegations contained in Paragraph 542 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 542 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 542 of the Complaint, and therefore denies the same.

543. The allegations contained in Paragraph 543 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 543 of the Complaint. To the extent the allegations contained in Paragraph 543 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent Paragraph 543 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 543 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 543 of the Complaint, and therefore denies the same.

544. Defendant denies the allegations contained in Paragraph 544 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 544 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 544 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 544 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 544 of the Complaint set forth purported medical and/or expert opinions, no response is required.

American Pain Foundation

545. The allegations contained in Paragraph 545 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 545 of the Complaint. To the extent the allegations contained in Paragraph 545 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 545 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 545 of the Complaint, and therefore denies the same.

546. The allegations contained in Paragraph 546 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 546 of the Complaint. To the extent the allegations contained in Paragraph 546 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 546 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 546 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 546 of the Complaint, and therefore denies the same.

547. The allegations contained in Paragraph 547 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 547 of the Complaint. To the extent the allegations contained in Paragraph 547 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 547 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 547 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 547 of the Complaint, and therefore denies the same.

548. The allegations contained in Paragraph 548 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 548 of the Complaint. To the extent the allegations contained in Paragraph 548 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 548 of the Complaint, and therefore denies the same.

549. Defendant denies the allegations contained in Paragraph 549 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 549 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 549 of the Complaint set forth legal arguments and legal conclusions, no response is required.

550. The allegations contained in Paragraph 550 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 550 of the Complaint. To the extent the allegations contained in Paragraph 550 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 550 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 550 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 550 of the Complaint, and therefore denies the same.

551. Defendant denies the allegations contained in Paragraph 551 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 551 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 551 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 551 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in

Paragraph 551 of the Complaint set forth purported medical and/or expert opinions, no response is required.

552. The allegations contained in Paragraph 552 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 552 of the Complaint. To the extent the allegations contained in Paragraph 552 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 552 of the Complaint, and therefore denies the same.

American Academy of Pain Medicine and the American Pain Society

553. Defendant denies the allegations contained in Paragraph 553 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 553 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 553 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 553 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

554. The allegations contained in Paragraph 554 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 554 of the Complaint. To the extent the allegations contained in Paragraph 554 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 554 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 554 of the Complaint, and therefore denies the same.

555. The allegations contained in Paragraph 555 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 555 of the Complaint. To the extent the allegations contained in Paragraph 555 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 555 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 555 of the Complaint, and therefore denies the same.

556. The allegations contained in Paragraph 556 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 556 of the Complaint. To the extent the allegations contained in Paragraph 556 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 556 of the Complaint, and therefore denies the same.

557. The allegations contained in Paragraph 557 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 557 of the Complaint. To the extent the allegations contained in Paragraph 557 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 557 of the Complaint, and therefore denies the same.

558. Defendant denies the allegations contained in Paragraph 558 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 558 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the



allegations contained in Paragraph 558 of the Complaint set forth legal arguments and legal conclusions, no response is required.

559. Defendant denies the allegations contained in Paragraph 559 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 559 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 559 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 559 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

560. The allegations contained in Paragraph 560 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 560 of the Complaint. To the extent the allegations contained in Paragraph 560 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 560 of the Complaint, and therefore denies the same.

561. The allegations contained in Paragraph 561 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 561 of the Complaint. To the extent the allegations contained in Paragraph 561 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 561 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 561 of the Complaint, and therefore denies the same.

562. The allegations contained in Paragraph 562 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 562 of the Complaint. To the extent the allegations contained in Paragraph 562 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 562 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 562 of the Complaint, and therefore denies the same.

563. The allegations contained in Paragraph 563 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 563 of the Complaint. To the extent the allegations contained in Paragraph 563 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 563 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 563 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 563 of the Complaint, and therefore denies the same.

564. The allegations contained in Paragraph 564 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 564 of the Complaint. To the extent the allegations contained in Paragraph 564 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 564 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in

Paragraph 564 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 564 of the Complaint, and therefore denies the same.

Federation of State Medical Boards

565. The allegations contained in Paragraph 565 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 565 of the Complaint. To the extent the allegations contained in Paragraph 565 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 565 of the Complaint, and therefore denies the same.

566. The allegations contained in Paragraph 566 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 566 of the Complaint. To the extent the allegations contained in Paragraph 566 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 566 of the Complaint, and therefore denies the same.

567. The allegations contained in Paragraph 567 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 567 of the Complaint. To the extent the allegations contained in Paragraph 567 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 567 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 567 of the Complaint, and therefore denies the same.

568. The allegations contained in Paragraph 568 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 568 of the Complaint. To the extent the allegations contained in Paragraph 568 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 568 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 568 of the Complaint, and therefore denies the same.

569. The allegations contained in Paragraph 569 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 569 of the Complaint. To the extent the allegations contained in Paragraph 569 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 569 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 569 of the Complaint, and therefore denies the same.

570. The allegations contained in Paragraph 570 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 570 of the Complaint. To the extent the allegations contained in Paragraph 570 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 570 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in

Paragraph 570 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 570 of the Complaint, and therefore denies the same.

The Alliance for Patient Access

571. The allegations contained in Paragraph 571 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 571 of the Complaint. To the extent the allegations contained in Paragraph 571 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 571 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 571 of the Complaint, and therefore denies the same.

572. The allegations contained in Paragraph 572 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 572 of the Complaint. To the extent the allegations contained in Paragraph 572 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 572 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 572 of the Complaint, and therefore denies the same.

573. The allegations contained in Paragraph 573 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 573 of the Complaint. To the extent the allegations contained in Paragraph 573 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent Paragraph 573 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 573 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 573 of the Complaint, and therefore denies the same.

574. The allegations contained in Paragraph 574 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 574 of the Complaint. To the extent the allegations contained in Paragraph 574 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 574 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 574 of the Complaint, and therefore denies the same.

575. The allegations contained in Paragraph 575 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 575 of the Complaint. To the extent the allegations contained in Paragraph 575 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 575 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 575 of the Complaint, and therefore denies the same.

576. The allegations contained in Paragraph 576 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 576 of the Complaint. To the extent the allegations contained in Paragraph 576 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 576 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 576 of the Complaint, and therefore denies the same.

577. The allegations contained in Paragraph 577 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 577 of the Complaint. To the extent the allegations contained in Paragraph 577 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 577 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 577 of the Complaint, and therefore denies the same.

578. The allegations contained in Paragraph 578 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 578 of the Complaint. To the extent the allegations contained in Paragraph 578 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 578 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 578 of the Complaint, and therefore denies the same.

The U.S. Pain Foundation

579. The allegations contained in Paragraph 579 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 579 of the Complaint. To the extent the allegations contained in Paragraph 579 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 579 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 579 of the Complaint, and therefore denies the same.

American Geriatrics Society

580. The allegations contained in Paragraph 580 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 580 of the Complaint. To the extent the allegations contained in Paragraph 580 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 580 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 580 of the Complaint, and therefore denies the same.

581. The allegations contained in Paragraph 581 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 581 of the Complaint. To the extent the allegations contained in Paragraph 581 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 581 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in



Paragraph 581 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 581 of the Complaint, and therefore denies the same.

582. The allegations contained in Paragraph 582 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 582 of the Complaint. To the extent the allegations contained in Paragraph 582 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 582 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 582 of the Complaint, and therefore denies the same.

583. The allegations contained in Paragraph 583 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 583 of the Complaint. To the extent the allegations contained in Paragraph 583 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 583 of the Complaint, and therefore denies the same.

**ii. The Marketing Defendants Paid Key Opinion Leaders to Deceptively Promote Opioid Use**

584. The allegations contained in Paragraph 584 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 584 of the Complaint. To the extent the allegations contained in Paragraph 584 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 584 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 584 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 584 of the Complaint, and therefore denies the same.

585. The allegations contained in Paragraph 585 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 585 of the Complaint. To the extent the allegations contained in Paragraph 585 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 585 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 585 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 585 of the Complaint, and therefore denies the same.

586. The allegations contained in Paragraph 586 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 586 of the Complaint. To the extent the allegations contained in Paragraph 586 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 586 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 586 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or

information to form a belief as to the truth of the allegations contained in Paragraph 586 of the Complaint, and therefore denies the same.

587. The allegations contained in Paragraph 587 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 587 of the Complaint. To the extent the allegations contained in Paragraph 587 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 587 of the Complaint, and therefore denies the same.

588. The allegations contained in Paragraph 588 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 588 of the Complaint. To the extent the allegations contained in Paragraph 588 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 588 of the Complaint, and therefore denies the same.

589. The allegations contained in Paragraph 589 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 589 of the Complaint. To the extent the allegations contained in Paragraph 589 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 589 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 589 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 589 of the Complaint, and therefore denies the same.

590. The allegations contained in Paragraph 590 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 590 of the Complaint. To the extent the allegations contained in Paragraph 590 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 590 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 590 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 590 of the Complaint, and therefore denies the same.

591. The allegations contained in Paragraph 591 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 591 of the Complaint. To the extent the allegations contained in Paragraph 591 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 591 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 591 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 591 of the Complaint, and therefore denies the same.

Dr. Russell Portenoy

592. The allegations contained in Paragraph 592 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 592 of the Complaint. To the extent the allegations contained in Paragraph 592 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent Paragraph 592 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 592 of the Complaint, and therefore denies the same.

593. The allegations contained in Paragraph 593 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 593 of the Complaint. To the extent the allegations contained in Paragraph 593 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 593 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 593 of the Complaint, and therefore denies the same.

594. The allegations contained in Paragraph 594 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 594 of the Complaint. To the extent the allegations contained in Paragraph 594 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 594 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 594 of the Complaint, and therefore denies the same.

595. The allegations contained in Paragraph 595 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 595 of the Complaint. To the extent the allegations contained in Paragraph 595 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent Paragraph 595 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 595 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 595 of the Complaint, and therefore denies the same.

596. The allegations contained in Paragraph 596 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 596 of the Complaint. To the extent the allegations contained in Paragraph 596 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 596 of the Complaint, and therefore denies the same.

597. The allegations contained in Paragraph 597 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 597 of the Complaint. To the extent the allegations contained in Paragraph 597 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 597 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 597 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 597 of the Complaint, and therefore denies the same.

598. The allegations contained in Paragraph 598 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 598 of the Complaint. To the extent the allegations contained in Paragraph 598 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 598 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 598 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 598 of the Complaint, and therefore denies the same.

599. The allegations contained in Paragraph 599 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 599 of the Complaint. To the extent the allegations contained in Paragraph 599 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 599 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 599 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 599 of the Complaint, and therefore denies the same.

Dr. Lynn Webster

600. The allegations contained in Paragraph 600 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 600 of the Complaint. To the extent the allegations contained in Paragraph 600 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 600 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 600 of the Complaint, and therefore denies the same.

601. The allegations contained in Paragraph 601 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 601 of the Complaint. To the extent the allegations contained in Paragraph 601 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 601 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 601 of the Complaint, and therefore denies the same.

602. The allegations contained in Paragraph 602 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 602 of the Complaint. To the extent the allegations contained in Paragraph 602 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 602 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 602 of the Complaint, and therefore denies the same.

603. The allegations contained in Paragraph 603 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 603 of the Complaint. To the extent the allegations contained in Paragraph 603 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 603 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and



Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 603 of the Complaint, and therefore denies the same.

604. The allegations contained in Paragraph 604 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 604 of the Complaint. To the extent the allegations contained in Paragraph 604 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 604 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 604 of the Complaint, and therefore denies the same.

Dr. Perry Fine

605. The allegations contained in Paragraph 605 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 605 of the Complaint. To the extent the allegations contained in Paragraph 605 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 605 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 605 of the Complaint, and therefore denies the same.

606. The allegations contained in Paragraph 606 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 606 of the Complaint. To the extent the allegations contained in Paragraph 606 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 606 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 606 of the Complaint, and therefore denies the same.

607. The allegations contained in Paragraph 607 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 607 of the Complaint. To the extent the allegations contained in Paragraph 607 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 607 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 607 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 607 of the Complaint, and therefore denies the same.

608. The allegations contained in Paragraph 608 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 608 of the Complaint. To the extent the allegations contained in Paragraph 608 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 608 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 608 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 608 of the Complaint, and therefore denies the same.

609. The allegations contained in Paragraph 609 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 609 of the Complaint. To the extent the allegations contained in Paragraph 609 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 609 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 609 of the Complaint, and therefore denies the same.

610. The allegations contained in Paragraph 610 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 610 of the Complaint. To the extent the allegations contained in Paragraph 610 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 610 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 610 of the Complaint, and therefore denies the same.

611. The allegations contained in Paragraph 611 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 611 of the Complaint. To the extent the allegations contained in Paragraph 611 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 611 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 611 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or

information to form a belief as to the truth of the allegations contained in Paragraph 611 of the Complaint, and therefore denies the same.

Dr. Scott Fishman

612. The allegations contained in Paragraph 612 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 612 of the Complaint. To the extent the allegations contained in Paragraph 612 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 612 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 612 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 612 of the Complaint, and therefore denies the same.

613. The allegations contained in Paragraph 613 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 613 of the Complaint. To the extent the allegations contained in Paragraph 613 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 613 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 613 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 613 of the Complaint, and therefore denies the same.

614. The allegations contained in Paragraph 614 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 614 of the Complaint. To the extent the allegations contained in Paragraph 614 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 614 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 614 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 614 of the Complaint, and therefore denies the same.

615. The allegations contained in Paragraph 615 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 615 of the Complaint. To the extent the allegations contained in Paragraph 615 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 615 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 615 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 615 of the Complaint, and therefore denies the same.

616. The allegations contained in Paragraph 616 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 616 of the Complaint. To the extent the allegations contained in Paragraph 616 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 616 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in

Paragraph 616 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 616 of the Complaint, and therefore denies the same.

**iii. The Marketing Defendants Disseminated Their Misrepresentations Through Continuing Medical Education Programs**

617. The allegations contained in Paragraph 617 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 617 of the Complaint. To the extent the allegations contained in Paragraph 617 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 617 of the Complaint, and therefore denies the same.

618. The allegations contained in Paragraph 618 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 618 of the Complaint. To the extent the allegations contained in Paragraph 618 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 618 of the Complaint, and therefore denies the same.

619. The allegations contained in Paragraph 619 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 619 of the Complaint. To the extent the allegations contained in Paragraph 619 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 619 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form

a belief as to the truth of the allegations contained in Paragraph 619 of the Complaint, and therefore denies the same.

620. Defendant denies the allegations contained in Paragraph 620 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 620 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 620 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 620 of the Complaint set forth purported medical and/or expert opinions, no response is required.

621. The allegations contained in Paragraph 621 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 621 of the Complaint. To the extent the allegations contained in Paragraph 621 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 621 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 621 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 621 of the Complaint, and therefore denies the same.

622. The allegations contained in Paragraph 622 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 622 of the Complaint. To the extent the allegations contained in Paragraph 622 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 622 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in

Paragraph 622 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 622 of the Complaint, and therefore denies the same.

623. The allegations contained in Paragraph 623 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 623 of the Complaint. To the extent the allegations contained in Paragraph 623 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 623 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 623 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 623 of the Complaint, and therefore denies the same.

624. The allegations contained in Paragraph 624 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 624 of the Complaint. To the extent the allegations contained in Paragraph 624 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 624 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 624 of the Complaint, and therefore denies the same.

625. The allegations contained in Paragraph 625 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 625 of the Complaint. To the



extent the allegations contained in Paragraph 625 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 625 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 625 of the Complaint, and therefore denies the same.

626. The allegations contained in Paragraph 626 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 626 of the Complaint. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 626 of the Complaint, and therefore denies the same.

627. The allegations contained in Paragraph 627 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 627 of the Complaint. To the extent the allegations contained in Paragraph 627 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 627 of the Complaint, and therefore denies the same.

628. The allegations contained in Paragraph 628 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 628 of the Complaint. To the extent the allegations contained in Paragraph 628 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 628 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form

a belief as to the truth of the allegations contained in Paragraph 628 of the Complaint, and therefore denies the same.

629. The allegations contained in Paragraph 629 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 629 of the Complaint. To the extent the allegations contained in Paragraph 629 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 629 of the Complaint, and therefore denies the same.

**i. The Marketing Defendants Used “Branded” Advertising to Promote their Products to Doctors and Consumers**

630. The allegations contained in Paragraph 630 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 630 of the Complaint. To the extent the allegations contained in Paragraph 630 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 630 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 630 of the Complaint, and therefore denies the same.

631. The allegations contained in Paragraph 631 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 631 of the Complaint. To the extent the allegations contained in Paragraph 631 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 631 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in

Paragraph 631 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 631 of the Complaint, and therefore denies the same.

**ii. The Marketing Defendants Used “Unbranded” Advertising to Promote Opioid Use for Chronic Pain Without FDA Review**

632. The allegations contained in Paragraph 632 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 632 of the Complaint. To the extent the allegations contained in Paragraph 632 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 632 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 632 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 632 of the Complaint, and therefore denies the same.

633. The allegations contained in Paragraph 633 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 633 of the Complaint. To the extent the allegations contained in Paragraph 633 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 633 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 633 of the Complaint, and therefore denies the same.

**iii. The Marketing Defendants Funded, Edited and Distributed Publications That Supported Their Misrepresentations**

634. The allegations contained in Paragraph 634 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 634 of the Complaint. To the extent the allegations contained in Paragraph 634 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 634 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 634 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 634 of the Complaint, and therefore denies the same.

635. The allegations contained in Paragraph 635 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 635 of the Complaint. To the extent the allegations contained in Paragraph 635 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 635 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 635 of the Complaint, and therefore denies the same.

636. The allegations contained in Paragraph 636 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 636 of the Complaint. To the extent the allegations contained in Paragraph 636 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 636 of the Complaint, and therefore denies the same.

637. The allegations contained in Paragraph 637 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 637 of the Complaint. To the extent the allegations contained in Paragraph 637 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 637 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 637 of the Complaint, and therefore denies the same.

638. The allegations contained in Paragraph 638 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 638 of the Complaint. To the extent the allegations contained in Paragraph 638 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 638 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 638 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 638 of the Complaint, and therefore denies the same.

639. The allegations contained in Paragraph 639 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 639 of the Complaint. To the extent the allegations contained in Paragraph 639 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 639 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 639 of the Complaint, and therefore denies the same.

**iv. The Marketing Defendants Used Detailing to Directly Disseminated Their Misrepresentations to Prescribers**

640. The allegations contained in Paragraph 640 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 640 of the Complaint. To the extent the allegations contained in Paragraph 640 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 640 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 640 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 640 of the Complaint, and therefore denies the same.

641. The allegations contained in Paragraph 641 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 641 of the Complaint. To the extent the allegations contained in Paragraph 641 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 641 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 641 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or

information to form a belief as to the truth of the allegations contained in Paragraph 641 of the Complaint, and therefore denies the same.

642. The allegations contained in Paragraph 642 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 642 of the Complaint. To the extent the allegations contained in Paragraph 642 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 642 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 642 of the Complaint, and therefore denies the same.

643. The allegations contained in Paragraph 643 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 643 of the Complaint. To the extent the allegations contained in Paragraph 643 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 643 of the Complaint, and therefore denies the same.

644. The allegations contained in Paragraph 644 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 644 of the Complaint. To the extent the allegations contained in Paragraph 644 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 644 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 644 of the Complaint, and therefore denies the same.

645. The allegations contained in Paragraph 645 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 645 of the Complaint. To the extent the allegations contained in Paragraph 645 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 645 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 645 of the Complaint, and therefore denies the same.

646. The allegations contained in Paragraph 646 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 646 of the Complaint. To the extent the allegations contained in Paragraph 646 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 646 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 646 of the Complaint, and therefore denies the same.

647. The allegations contained in Paragraph 647 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 647 of the Complaint. To the extent the allegations contained in Paragraph 647 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 647 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 647 of the Complaint, and therefore denies the same.



648. The allegations contained in Paragraph 648 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 648 of the Complaint. To the extent the allegations contained in Paragraph 648 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 648 of the Complaint, and therefore denies the same.

649. The allegations contained in Paragraph 649 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 649 of the Complaint. To the extent the allegations contained in Paragraph 649 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 649 of the Complaint, and therefore denies the same.

**v. Marketing Defendants Used Speakers' Bureaus and Programs to Spread Their Deceptive Messages.**

650. The allegations contained in Paragraph 650 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 650 of the Complaint. To the extent the allegations contained in Paragraph 650 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 650 of the Complaint, and therefore denies the same.

**3. The Marketing Defendants Targeted Vulnerable Populations**

651. The allegations contained in Paragraph 651 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 651 of the Complaint. To the extent the allegations contained in Paragraph 651 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 651 of the Complaint, and therefore denies the same.

652. The allegations contained in Paragraph 652 of the Complaint set forth purported medical and/or expert opinions, to which no response is required. To the extent the allegations contained in Paragraph 652 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 652 of the Complaint, and therefore denies the same.

653. The allegations contained in Paragraph 653 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 653 of the Complaint. To the extent the allegations contained in Paragraph 653 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 653 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 653 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 653 of the Complaint, and therefore denies the same.

654. The allegations contained in Paragraph 654 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 654 of the Complaint. To the extent the allegations contained in Paragraph 654 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph

654 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 654 of the Complaint, and therefore denies the same.

655. The allegations contained in Paragraph 655 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 655 of the Complaint. To the extent the allegations contained in Paragraph 655 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 655 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 655 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 655 of the Complaint, and therefore denies the same.

656. The allegations contained in Paragraph 656 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 656 of the Complaint. To the extent the allegations contained in Paragraph 656 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 656 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 656 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 656 of the Complaint, and therefore denies the same.

657. The allegations contained in Paragraph 657 of the Complaint set forth purported medical and/or expert opinions, to which no response is required. To the extent the allegations contained in Paragraph 657 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 657 of the Complaint, and therefore denies the same.

**4. The Marketing Defendants Had an Obligation to Educate Doctors to Prevent Future Harm**

658. The allegations contained in Paragraph 658 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 658 of the Complaint. To the extent the allegations contained in Paragraph 658 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 658 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 658 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 658 of the Complaint, and therefore denies the same.

659. The allegations contained in Paragraph 659 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 659 of the Complaint. To the extent the allegations contained in Paragraph 659 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 659 of the Complaint, and therefore denies the same.

**5. The Marketing Defendants' Scheme Succeeded, Creating a Public Health Epidemic**

**i. Marketing Defendants' dramatically expanded opioid prescribing and use.**

660. The allegations contained in Paragraph 660 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 660 of the Complaint. To the extent the allegations contained in Paragraph 660 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 660 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 660 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 660 of the Complaint, and therefore denies the same.

661. The allegations contained in Paragraph 661 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 661 of the Complaint. To the extent the allegations contained in Paragraph 661 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 661 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 661 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 661 of the Complaint, and therefore denies the same.

662. The allegations contained in Paragraph 662 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 662 of the Complaint. To the extent the allegations contained in Paragraph 662 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 662 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 662 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 662 of the Complaint, and therefore denies the same.

663. The allegations contained in Paragraph 663 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 663 of the Complaint. To the extent the allegations contained in Paragraph 663 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 663 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 663 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 663 of the Complaint, and therefore denies the same.

664. The allegations contained in Paragraph 664 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 664 of the Complaint. To the extent the allegations contained in Paragraph 664 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 664 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 664 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 664 of the Complaint, and therefore denies the same.

665. The allegations contained in Paragraph 665 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 665 of the Complaint. To the extent the allegations contained in Paragraph 665 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 665 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 665 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 665 of the Complaint, and therefore denies the same.

666. The allegations contained in Paragraph 666 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 666 of the Complaint. To the extent the allegations contained in Paragraph 666 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 666 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 666 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or

information to form a belief as to the truth of the allegations contained in Paragraph 666 of the Complaint, and therefore denies the same.

**ii. Marketing Defendants' deception in expanding their market created and fueled the opioid epidemic.**

667. The allegations contained in Paragraph 667 of the Complaint set forth purported medical and/or expert opinions, to which no response is required. To the extent the allegations contained in Paragraph 667 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 667 of the Complaint, and therefore denies the same.

668. The allegations contained in Paragraph 668 of the Complaint set forth purported medical and/or expert opinions, to which no response is required. To the extent the allegations contained in Paragraph 668 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 668.

669. The allegations contained in Paragraph 669 of the Complaint set forth purported medical and/or expert opinions, to which no response is required. To the extent the allegations contained in Paragraph 669 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 669 of the Complaint, and therefore denies the same.

**F. The Supply Chain Defendants and National Pharmacies Deliberately Disregarded Their Duties to Maintain Effective Controls Against Diversion**

670. Defendant denies the allegations contained in Paragraph 670 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 670 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to



form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 670 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 670.

671. Defendant denies the allegations contained in Paragraph 671 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 671 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 671 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 671.

672. The allegations contained in Paragraph 672 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 672 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 672 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

673. Defendant denies the allegations contained in Paragraph 673 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 673 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 673 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 673 of the Complaint set forth purported medical and/or expert opinions, no response is required.

674. The allegations contained in Paragraph 674 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 674 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 674 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

675. Defendant denies the allegations contained in Paragraph 675 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 675 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 675 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 675 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 675.

676. Defendant denies the allegations contained in Paragraph 676 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 676 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 676 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 676 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 676.

677. Defendant denies the allegations contained in Paragraph 677 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 677 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 677 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 677 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 677.

678. The allegations contained in Paragraph 678 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 678 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

**1. ARCOS / DADS DATA**

679. The allegations contained in Paragraph 679 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 679 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent Paragraph 679 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

680. The allegations contained in Paragraph 680 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 680 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent Paragraph 680 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 680 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. By way of further response, Defendant admits that ARCOS data submitted to the DEA by wholesale distributors has historically been treated as confidential by the DEA. Defendant further states that Defendant only has access to the complete ARCOS data Defendant submits to the DEA and does not have access, in the normal course or for non-litigation purposes, to the complete ARCOS data submitted to the DEA by any parties or entities other than Defendant. Defendant further states that starting in or around February 2018,

pursuant to a provision of the SUPPORT Act (as enacted at 21 U.S.C. § 827(f)), the DEA has provided certain limited and anonymized ARCOS data to wholesale distributors, including Defendant. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 680.

681. Defendant denies the allegations contained in Paragraph 681 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 681 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 681 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 681 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 681.

682. The allegations contained in Paragraph 682 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 682 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 682 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. By way of further response, Defendant admits only that Defendant is a wholesale distributor of various prescription medications (as well as over-the-counter medications) and that Defendant has distributed controlled substances, including opioids, to retail pharmacies and other entities located in Cabell County and the City of Huntington only to the extent that those pharmacies and

other entities are registered with the DEA and licensed in West Virginia. Further, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 682.

683. The allegations contained in Paragraph 683 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant admits only that only the DEA, and not registrants like Defendant, has access to the complete ARCOS data submitted to the DEA. To the extent the allegations contained in Paragraph 683 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 683 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations contained in Paragraph 683 of the Complaint, and therefore denies the same.

684. The allegations contained in Paragraph 684 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 684 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant admits only that only the DEA, and not registrants like Defendant, has access to the complete ARCOS data submitted to the DEA. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations contained in Paragraph 684 of the Complaint, and therefore denies the same.

685. The allegations contained in Paragraph 685 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 685 of the Complaint purports to be based on state or federal laws or regulations, those laws and

regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant admits only that only the DEA, and not registrants like Defendant, has access to the complete ARCOS data submitted to the DEA. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations contained in Paragraph 685 of the Complaint, and therefore denies the same.

686. The allegations contained in Paragraph 686 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 686 of the Complaint. To the extent the allegations contained in Paragraph 686 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 686 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant admits only that only the DEA, and not registrants like Defendant, has access to the complete ARCOS data submitted to the DEA. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations contained in Paragraph 686 of the Complaint, and therefore denies the same.

687. The allegations contained in Paragraph 687 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 687 of the Complaint. To the extent the allegations contained in Paragraph 687 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 687 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 687 of the Complaint, and therefore denies the same. By way of further response, Defendant incorporates by reference its response to Paragraph 680.

688. Defendant denies the allegations contained in Paragraph 688 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 688 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 688 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 688 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

689. The allegations contained in Paragraph 689 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 689 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Defendant denies the allegations contained in Paragraph 689 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 689 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

690. The allegations contained in Paragraph 690 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 690 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 690 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

691. Defendant denies the allegations contained in Paragraph 691 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 691 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the



allegations contained in Paragraph 691 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 691 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 691.

**2. As Registrants Under the Controlled Substances Act, Supply Chain Defendants and National Pharmacies Have a Duty to Maintain Effective Controls Against Diversion and Supply Chain Defendants Have a Duty to Detect, Report, and Halt Suspicious Orders.**

692. The allegations contained in Paragraph 692 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 692 of the Complaint set forth legal arguments and legal conclusions, no response is required.

693. The allegations contained in Paragraph 693 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 693 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 693 of the Complaint, and therefore denies the same.

694. The allegations contained in Paragraph 694 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 694 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the

extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 694 of the Complaint, and therefore denies the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 694.

695. The allegations contained in Paragraph 695 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 695 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent Paragraph 695 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 695.

696. The allegations contained in Paragraph 696 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 696 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 696 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 696 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 696 of the Complaint, and therefore denies the same.

**iii. Federal Statutory Duty**

697. The allegations contained in Paragraph 697 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 697 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 697 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 697 of the Complaint, and therefore denies the same.

698. The allegations contained in Paragraph 698 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 698 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 698 of the Complaint, and therefore denies the same.

699. The allegations contained in Paragraph 699 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 699 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 699 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 699 of the Complaint, and therefore denies the same.

700. The allegations contained in Paragraph 700 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 700 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 700 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 700 of the Complaint, and therefore denies the same.

701. The allegations contained in Paragraph 701 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 701 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 701 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 701 of the Complaint, and therefore denies the same.

702. The allegations contained in Paragraph 702 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 702 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 702 of the Complaint, and therefore denies the same.

703. The allegations contained in Paragraph 703 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 703 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 703 of the Complaint, and therefore denies the same.

**iv. Federal Regulatory Duty**

704. The allegations contained in Paragraph 704 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 704 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 704 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 704 of the Complaint, and therefore denies the same.

705. The allegations contained in Paragraph 705 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 705 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 705 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 705 of the Complaint, and therefore denies the same.

706. The allegations contained in Paragraph 706 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 706 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

707. The allegations contained in Paragraph 707 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 707 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 707 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

708. The allegations contained in Paragraph 708 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 708 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent Paragraph 708 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

709. The allegations contained in Paragraph 709 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 709 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 709 of the Complaint, and therefore denies the same.

**v. DEA Guidance**

710. The allegations contained in Paragraph 710 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 710 of the Complaint purports to be based on documents or websites, those documents or websites speak

for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 710 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 710 of the Complaint, and therefore denies the same. Further answering, Defendant admits only that the DEA has previously hosted conferences for registrants and that Defendant has attended one or more of these DEA conferences over the years. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 710.

711. Defendant admits only that it received a letter dated September 27, 2006 from the DEA and that this letter speaks for itself and Defendant denies any characterizations of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. To the extent the allegations contained in Paragraph 711 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations. To the extent Paragraph 711 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 711.

712. The allegations contained in Paragraph 57 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 712 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. Defendant admits only that it received a letter dated December 27, 2007 from the DEA and that the letter speaks for itself and Defendant denies any characterizations of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its

legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 712.

713. In response to Paragraph 713, Defendant admits only that it received a letter dated December 27, 2007 from the DEA and that the letter speaks for itself and Defendant denies any characterizations of the same. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 713.

714. The allegations contained in Paragraph 714 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 714 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent Paragraph 714 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 714 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 714 of the Complaint, and therefore denies the same.

715. The allegations contained in Paragraph 715 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 715 of the Complaint. To the extent the allegations contained in Paragraph 715 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 715 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant



lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 715 of the Complaint, and therefore denies the same.

716. The allegations contained in Paragraph 716 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 716 of the Complaint. To the extent the allegations contained in Paragraph 716 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 716 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 716 of the Complaint, and therefore denies the same.

**vi. Duties pursuant to West Virginia Law**

717. Defendant denies the allegations contained in Paragraph 717 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 717 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 717 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 717.

718. Defendant denies the allegations contained in Paragraph 718 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 718 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to

form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 718 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 718.

719. The allegations contained in Paragraph 719 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 719 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 719 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

720. The allegations contained in Paragraph 720 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 720 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 720 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

721. The allegations contained in Paragraph 721 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 721 of the Complaint set forth legal arguments and legal conclusions, no response is required.

722. The allegations contained in Paragraph 722 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 722 of the Complaint set forth legal arguments and legal conclusions, no response is required.

723. The allegations contained in Paragraph 723 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 723 of the Complaint set forth legal arguments and legal conclusions, no response is required.

724. The allegations contained in Paragraph 724 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 724 of the Complaint set forth legal arguments and legal conclusions, no response is required.

725. The allegations contained in Paragraph 725 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 725 of the Complaint set forth legal arguments and legal conclusions, no response is required.

726. The allegations contained in Paragraph 726 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 726 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 726 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

727. The allegations contained in Paragraph 727 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 727 of the Complaint set forth legal arguments and legal conclusions, no response is required.

728. The allegations contained in Paragraph 728 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 728 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 728 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

729. The allegations contained in Paragraph 729 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 729 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

730. The allegations contained in Paragraph 730 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 730 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 730 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

731. The allegations contained in Paragraph 731 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 731 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 731 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

732. The allegations contained in Paragraph 732 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 732 of

the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 732 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

733. The allegations contained in Paragraph 733 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 733 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 733 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

734. The allegations contained in Paragraph 734 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 734 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 734 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

**3. Supply Chain Defendants and National Pharmacies Have a Duty to Apply their Specialized Knowledge of the Market to Prevent Diversion**

735. The allegations contained in Paragraph 735 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 735 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 735 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the

allegations, and therefore denies the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 735.

736. The allegations contained in Paragraph 736 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 736 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent Paragraph 736 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 736 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 736.

737. The allegations contained in Paragraph 737 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 737 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent Paragraph 737 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 737 of the Complaint are directed to

other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 737.

738. The allegations contained in Paragraph 738 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 738 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 738.

739. The allegations contained in Paragraph 739 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 739 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 739 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

740. The allegations contained in Paragraph 740 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 740 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the

allegations contained in Paragraph 740 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

741. The allegations contained in Paragraph 741 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 741 of the Complaint. To the extent the allegations contained in Paragraph 741 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 741 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 741 of the Complaint, and therefore denies the same.

742. The allegations contained in Paragraph 742 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 742 of the Complaint. To the extent the allegations contained in Paragraph 742 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 742 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 742 of the Complaint, and therefore denies the same.

743. The allegations contained in Paragraph 743 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 743 of the Complaint. To the extent the allegations contained in Paragraph 743 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 743 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and



Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 743 of the Complaint, and therefore denies the same.

744. The allegations contained in Paragraph 744 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 744 of the Complaint. To the extent the allegations contained in Paragraph 744 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 744 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 744 of the Complaint, and therefore denies the same.

745. The allegations contained in Paragraph 745 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 745 of the Complaint. To the extent the allegations contained in Paragraph 745 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 745 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 745 of the Complaint, and therefore denies the same.

746. The allegations contained in Paragraph 746 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 746 of the Complaint. To the extent the allegations contained in Paragraph 746 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 746 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 746 of the Complaint, and therefore denies the same.

747. The allegations contained in Paragraph 747 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 747 of the Complaint. To the extent the allegations contained in Paragraph 747 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 747 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 747 of the Complaint, and therefore denies the same.

748. The allegations contained in Paragraph 748 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 748 of the Complaint. To the extent the allegations contained in Paragraph 748 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 748 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 748 of the Complaint, and therefore denies the same.

749. The allegations contained in Paragraph 749 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 749 of the Complaint. To the extent the allegations contained in Paragraph 749 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 749 of the Complaint, and therefore denies the same.

**4. Supply Chain Defendants and National Pharmacies Were Aware of and Have Acknowledged Their Obligations to Prevent Diversion and to Report and Take Steps to Halt Suspicious Orders**

750. The allegations contained in Paragraph 750 of the Complaint set forth legal argument and legal conclusions to which no response is required.

751. The allegations contained in Paragraph 751 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 751 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 751.

752. The allegations contained in Paragraph 752 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 752 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant admits only that it is a member of the Healthcare Distribution Alliance (“HDA”), previously known as the Healthcare Distribution Management Association (“HDMA”), that HDA is a national organization whose members include pharmaceutical distributors, and that HDMA previously issued recommended guidelines for pharmaceutical system distribution integrity. To the extent the allegations contained in Paragraph 752 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the

truth of the allegations, and therefore denies the same. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 752.

753. The allegations contained in Paragraph 753 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 753 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 753 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. By way of further response, Defendant incorporates by reference its responses to Paragraphs 710 to 713. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 753.

754. The allegations contained in Paragraph 754 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 754 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 754 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 754.

755. The allegations contained in Paragraph 755 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 755 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 755 of the Complaint are directed to other parties, Defendant

lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

756. The allegations contained in Paragraph 756 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 756 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 756 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

757. The allegations contained in Paragraph 757 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 757 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

**5. Defendants Kept Careful Track of Prescribing Data and Knew About Suspicious Orders and Prescribers**

758. The allegations contained in Paragraph 758 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 758 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 758 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. By way of further response, Defendant incorporates by reference its response to Paragraph 680. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 758.

759. Defendant denies the allegations contained in Paragraph 759 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 759 of the

Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 759 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 759 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 759.

760. The allegations contained in Paragraph 760 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 760 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 760 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Further answering, Defendant admits that Defendant is a wholesale distributor of various prescription medications (as well as over-the-counter medications) and that Defendant has distributed controlled substances, including opioids, to retail pharmacies and other entities located in Cabell County and the City of Huntington only to the extent that those pharmacies and other entities are registered with the DEA and licensed in West Virginia. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 760.

761. Defendant denies the allegations contained in Paragraph 761 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 761 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 761 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 761 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 761.

762. The allegations contained in Paragraph 762 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 762 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 762 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

763. The allegations contained in Paragraph 763 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 763 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 763 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. Defendant further states that it complies with the obligation of a

wholesale distributor to “know [its] customer,” including through robust new and ongoing customer due diligence. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 763.

764. The allegations contained in Paragraph 764 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 764 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 764 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

765. The allegations contained in Paragraph 765 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 765 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 765 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

766. The allegations contained in Paragraph 766 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 766 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 766 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

767. The allegations contained in Paragraph 767 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 767 of the Complaint purports to be based on documents or websites, those documents or websites speak



for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 767 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

768. The allegations contained in Paragraph 768 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 768 of the Complaint. To the extent the allegations contained in Paragraph 768 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 768 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 768 of the Complaint, and therefore denies the same.

769. The allegations contained in Paragraph 769 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 769 of the Complaint. To the extent the allegations contained in Paragraph 769 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 769 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 769 of the Complaint, and therefore denies the same.

770. The allegations contained in Paragraph 770 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 770 of the Complaint. To the extent the allegations contained in Paragraph 770 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 770 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 770 of the Complaint, and therefore denies the same.

771. Defendant denies the allegations contained in Paragraph 771 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 771 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 771 of the Complaint set forth legal arguments and legal conclusions, no response is required.

772. The allegations contained in Paragraph 772 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 772 of the Complaint. To the extent the allegations contained in Paragraph 772 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 772 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 772 of the Complaint, and therefore denies the same.

773. Defendant denies the allegations contained in Paragraph 773 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 773 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 773 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report

suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 773.

774. Defendant denies the allegations contained in Paragraph 774 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 774 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 774 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 774 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 774.

775. Defendant denies the allegations contained in Paragraph 775 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 775 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 775 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 775 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

776. The allegations contained in Paragraph 776 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 776 of the Complaint. To the

extent the allegations contained in Paragraph 776 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 776 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 776 of the Complaint, and therefore denies the same.

777. The allegations contained in Paragraph 777 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 777 of the Complaint. To the extent the allegations contained in Paragraph 777 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 777 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 777 of the Complaint, and therefore denies the same.

778. The allegations contained in Paragraph 778 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 778 of the Complaint. To the extent the allegations contained in Paragraph 778 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 778 of the Complaint, and therefore denies the same.

779. The allegations contained in Paragraph 779 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 779 of the Complaint. To the extent the allegations contained in Paragraph 779 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 779 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 779 of the Complaint, and therefore denies the same.

780. The allegations contained in Paragraph 780 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 780 of the Complaint. To the extent the allegations contained in Paragraph 780 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 780 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 780 of the Complaint, and therefore denies the same.

781. The allegations contained in Paragraph 781 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 781 of the Complaint. To the extent the allegations contained in Paragraph 781 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 781 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 781 of the Complaint, and therefore denies the same.

782. The allegations contained in Paragraph 782 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 782 of the Complaint. To the extent the allegations contained in Paragraph 782 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 782 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 782 of the Complaint, and therefore denies the same.

783. The allegations contained in Paragraph 783 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 783 of the Complaint. To the extent the allegations contained in Paragraph 783 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 783 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 783 of the Complaint, and therefore denies the same.

784. The allegations contained in Paragraph 784 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 784 of the Complaint. To the extent the allegations contained in Paragraph 784 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 784 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 784 of the Complaint, and therefore denies the same.

785. The allegations contained in Paragraph 785 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 785 of the Complaint. To the extent the allegations contained in Paragraph 785 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 785 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 785 of the Complaint, and therefore denies the same.

786. The allegations contained in Paragraph 786 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 786 of the Complaint. To the extent the allegations contained in Paragraph 786 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 786 of the Complaint, and therefore denies the same.

**6. Despite Repeated Admonitions, Supply Chain Defendants Continued to Violate their Legal Obligations and Failed to Act to Prevent Diversion.**

787. Defendant denies the allegations contained in Paragraph 787 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 787 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 787 of the Complaint set forth legal arguments and legal conclusions, no response is required.

788. The allegations contained in Paragraph 788 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 788 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Further, Defendant admits that in 2007 the DEA temporarily suspended the license of one of its Florida distribution centers to distribute controlled substances. Defendant states that the DEA reinstated the suspended license shortly thereafter. Defendant further states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including

but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 788.

789. The allegations contained in Paragraph 789 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 789 of the Complaint. To the extent the allegations contained in Paragraph 789 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 789 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 789 of the Complaint, and therefore denies the same.

790. The allegations contained in Paragraph 790 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 790 of the Complaint. To the extent the allegations contained in Paragraph 790 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 790 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 790 of the Complaint, and therefore denies the same.

791. The allegations contained in Paragraph 791 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 791 of the Complaint. To the extent the allegations contained in Paragraph 791 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 791 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and



Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 791 of the Complaint, and therefore denies the same.

792. The allegations contained in Paragraph 792 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 792 of the Complaint. To the extent the allegations contained in Paragraph 792 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 792 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 792 of the Complaint, and therefore denies the same.

793. Defendant denies the allegations contained in Paragraph 793 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 793 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 793 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 793 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 793.

794. Defendant denies the allegations contained in Paragraph 794 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 794 of the

Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 794 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 794 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 794.

795. Defendant denies the allegations contained in Paragraph 795 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 795 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 795 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 795 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

796. The allegations contained in Paragraph 796 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 796 of the Complaint. To the extent the allegations contained in Paragraph 796 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 796 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 796 of the Complaint, and therefore denies the same.

797. The allegations contained in Paragraph 797 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 797 of the Complaint. To the extent the allegations contained in Paragraph 797 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 797 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 797 of the Complaint, and therefore denies the same.

798. The allegations contained in Paragraph 798 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 798 of the Complaint. To the extent the allegations contained in Paragraph 798 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 798 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 798 of the Complaint, and therefore denies the same.

799. The allegations contained in Paragraph 799 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 799 of the Complaint. To the extent the allegations contained in Paragraph 799 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 799 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 799 of the Complaint, and therefore denies the same.

800. The allegations contained in Paragraph 800 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 800 of the Complaint. To the extent the allegations contained in Paragraph 800 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 800 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 800 of the Complaint, and therefore denies the same.

**7. Supply Chain Defendants and National Pharmacies Breached Their Legal Duties and Failed to Prevent Diversion**

801. Defendant denies the allegations contained in Paragraph 801 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 801 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 801 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 801.

802. Defendant denies the allegations contained in Paragraph 802 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 802 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to

form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 802 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 802.

803. Defendant denies the allegations contained in Paragraph 803 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 803 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 803 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 803.

**i. AMERISOURCE BERGEN**

804. Defendant denies the allegations contained in Paragraph 804 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 804 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and

state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 804.

805. Defendant denies the allegations contained in Paragraph 805 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 805 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 805 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 805.

806. Defendant denies the allegations contained in Paragraph 806 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 806 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 806.

807. Defendant denies the allegations contained in Paragraph 807 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 807 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and

state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 807.

808. The allegations contained in Paragraph 808 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 808 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 808 of the Complaint, and therefore denies the same.

809. The allegations contained in Paragraph 809 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 809 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 809 of the Complaint, and therefore denies the same.

810. The allegations contained in Paragraph 810 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 810 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 810 of the Complaint, and therefore denies the same.

811. Defendant denies the allegations contained in Paragraph 811 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 811 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 811 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. By way of further response, Defendant admits that in 2007 the DEA temporarily suspended

the license of one of its Florida distribution centers to distribute controlled substances. Defendant states that the DEA reinstated the suspended license shortly thereafter. Defendant further states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 811.

812. Defendant denies the allegations contained in Paragraph 812 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 812 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 812 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Defendant further states that in 1998, the DEA expressly approved, in writing, the suspicious order monitoring program put in place by Defendant's predecessor, Bergen Brunswig, which expressly contemplated after-the-fact reporting of suspicious orders, as was consistent with industry practice at that time. This system was in effect until 2007. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 812.

813. The allegations contained in Paragraph 813 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 813 of the Complaint set forth legal arguments and legal conclusions, no response is required. Further, Defendant admits that in 2007 the DEA temporarily suspended the license of one of its Florida distribution centers to distribute controlled substances. Defendant states that the DEA reinstated the suspended license shortly



thereafter. Defendant further states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 813.

814. Defendant denies the allegations contained in Paragraph 814 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 814 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 814 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 814 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 814.

815. Defendant denies the allegations contained in Paragraph 815 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 815 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 815 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 815 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with

the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 815.

816. Defendant denies the allegations contained in Paragraph 816 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 816 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 816 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 816 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 816.

817. Defendant denies the allegations contained in Paragraph 817 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 817 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 817 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA.

Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 817.

818. The allegations contained in Paragraph 818 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. Defendant denies the allegations contained in Paragraph 818 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 818 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 818 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 818.

819. Defendant denies the allegations contained in Paragraph 819 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 819 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 819 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 819 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Defendant further states that it complies with the obligation of a wholesale distributor to

“know [its] customer,” including through robust new and ongoing customer due diligence. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 819.

820. Defendant denies the allegations contained in Paragraph 820 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 820 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 820 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 820 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 820.

821. Defendant denies the allegations contained in Paragraph 821 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 821 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 821 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 821 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the

DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 821.

**ii. CARDINAL HEALTH**

822. The allegations contained in Paragraph 822 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 822 of the Complaint. To the extent the allegations contained in Paragraph 822 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 822 of the Complaint, and therefore denies the same.

823. The allegations contained in Paragraph 823 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 823 of the Complaint. To the extent the allegations contained in Paragraph 823 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 823 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 823 of the Complaint, and therefore denies the same.

824. The allegations contained in Paragraph 824 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 824 of the Complaint. To the extent the allegations contained in Paragraph 824 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 824 of the Complaint, and therefore denies the same.

825. The allegations contained in Paragraph 825 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 825 of the Complaint. To the extent the allegations contained in Paragraph 825 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 825 of the Complaint, and therefore denies the same.

826. The allegations contained in Paragraph 826 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 826 of the Complaint. To the extent the allegations contained in Paragraph 826 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 826 of the Complaint, and therefore denies the same.

827. The allegations contained in Paragraph 827 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 827 of the Complaint. To the extent the allegations contained in Paragraph 827 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 827 of the Complaint, and therefore denies the same.

828. The allegations contained in Paragraph 828 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 828 of the Complaint. To the extent the allegations contained in Paragraph 828 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 828 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 828 of the Complaint, and therefore denies the same.

829. The allegations contained in Paragraph 829 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 829 of the Complaint. To the extent the allegations contained in Paragraph 829 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 829 of the Complaint, and therefore denies the same.

830. The allegations contained in Paragraph 830 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 830 of the Complaint. To the extent the allegations contained in Paragraph 830 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 830 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 830 of the Complaint, and therefore denies the same.

831. The allegations contained in Paragraph 831 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 831 of the Complaint. To the extent the allegations contained in Paragraph 831 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 831 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 831 of the Complaint, and therefore denies the same.

832. The allegations contained in Paragraph 832 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 832 of the Complaint. To the extent the allegations contained in Paragraph 832 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 832 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 832 of the Complaint, and therefore denies the same.

833. The allegations contained in Paragraph 833 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 833 of the Complaint. To the extent the allegations contained in Paragraph 833 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 833 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 833 of the Complaint, and therefore denies the same.

834. The allegations contained in Paragraph 834 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 834 of the Complaint. To the extent the allegations contained in Paragraph 834 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 834 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant



lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 834 of the Complaint, and therefore denies the same.

835. The allegations contained in Paragraph 835 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 835 of the Complaint. To the extent the allegations contained in Paragraph 835 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 835 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 835 of the Complaint, and therefore denies the same.

836. The allegations contained in Paragraph 836 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 836 of the Complaint. To the extent the allegations contained in Paragraph 836 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 836 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 836 of the Complaint, and therefore denies the same.

837. The allegations contained in Paragraph 837 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 837 of the Complaint. To the extent the allegations contained in Paragraph 837 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 837 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 837 of the Complaint, and therefore denies the same.

838. The allegations contained in Paragraph 838 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 838 of the Complaint. To the extent the allegations contained in Paragraph 838 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 838 of the Complaint, and therefore denies the same.

839. The allegations contained in Paragraph 839 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 839 of the Complaint. To the extent the allegations contained in Paragraph 839 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 839 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 839 of the Complaint, and therefore denies the same.

840. The allegations contained in Paragraph 840 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 840 of the Complaint. To the extent the allegations contained in Paragraph 840 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 840 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 840 of the Complaint, and therefore denies the same.

841. The allegations contained in Paragraph 841 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 841 of the Complaint. To the extent the allegations contained in Paragraph 841 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 841 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 841 of the Complaint, and therefore denies the same.

842. The allegations contained in Paragraph 842 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 842 of the Complaint. To the extent the allegations contained in Paragraph 842 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 842 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 842 of the Complaint, and therefore denies the same.

843. The allegations contained in Paragraph 843 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 843 of the Complaint. To the extent the allegations contained in Paragraph 843 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 843 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 843 of the Complaint, and therefore denies the same.

844. The allegations contained in Paragraph 844 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 844 of the Complaint. To the extent the allegations contained in Paragraph 844 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 844 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 844 of the Complaint, and therefore denies the same.

845. The allegations contained in Paragraph 845 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 845 of the Complaint. To the extent the allegations contained in Paragraph 845 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 845 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 845 of the Complaint, and therefore denies the same.

846. The allegations contained in Paragraph 846 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 846 of the Complaint. To the extent the allegations contained in Paragraph 846 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 846 of the Complaint, and therefore denies the same.

847. The allegations contained in Paragraph 847 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 847 of the Complaint. To the extent the allegations contained in Paragraph 847 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 847 of the Complaint, and therefore denies the same.

848. The allegations contained in Paragraph 848 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 848 of the Complaint. To the extent the allegations contained in Paragraph 848 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 848 of the Complaint, and therefore denies the same.

849. The allegations contained in Paragraph 849 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 849 of the Complaint. To the extent the allegations contained in Paragraph 849 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 849 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 849 of the Complaint, and therefore denies the same.

850. The allegations contained in Paragraph 850 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 850 of the Complaint. To the extent the allegations contained in Paragraph 850 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 850 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 850 of the Complaint, and therefore denies the same.

851. The allegations contained in Paragraph 851 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 851 of the Complaint. To the extent the allegations contained in Paragraph 851 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 851 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 851 of the Complaint, and therefore denies the same.

852. The allegations contained in Paragraph 852 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 852 of the Complaint. To the extent the allegations contained in Paragraph 852 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 852 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 852 of the Complaint, and therefore denies the same.

853. The allegations contained in Paragraph 853 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 853 of the Complaint. To the extent the allegations contained in Paragraph 853 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 853 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 853 of the Complaint, and therefore denies the same.

854. The allegations contained in Paragraph 854 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 854 of the Complaint. To the extent the allegations contained in Paragraph 854 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 854 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 854 of the Complaint, and therefore denies the same.

855. The allegations contained in Paragraph 855 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 855 of the Complaint. To the extent the allegations contained in Paragraph 855 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 855 of the Complaint, and therefore denies the same.

856. The allegations contained in Paragraph 856 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 856 of the Complaint. To the extent the allegations contained in Paragraph 856 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 856 of the Complaint, and therefore denies the same.

857. The allegations contained in Paragraph 857 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 857 of the Complaint. To the extent the allegations contained in Paragraph 857 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 857 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 857 of the Complaint, and therefore denies the same.

858. Paragraph 858 of the Complaint is blank and contains no allegations, and thus no response is required of Defendant. To the extent a response is required, Defendant denies Paragraph 858.

859. The allegations contained in Paragraph 859 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 859 of the Complaint. To the extent the allegations contained in Paragraph 859 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 859 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 859 of the Complaint, and therefore denies the same.

860. The allegations contained in Paragraph 860 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 860 of the Complaint. To the extent the allegations contained in Paragraph 860 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 860 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and



Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 860 of the Complaint, and therefore denies the same.

**iii. McKESSON**

861. The allegations contained in Paragraph 861 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 861 of the Complaint. To the extent the allegations contained in Paragraph 861 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 861 of the Complaint, and therefore denies the same.

862. The allegations contained in Paragraph 862 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 862 of the Complaint. To the extent the allegations contained in Paragraph 862 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 862 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 862 of the Complaint, and therefore denies the same.

863. The allegations contained in Paragraph 863 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 863 of the Complaint. To the extent the allegations contained in Paragraph 863 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 863 of the Complaint, and therefore denies the same.

864. The allegations contained in Paragraph 864 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 864 of the Complaint. To the extent the allegations contained in Paragraph 864 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 864 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 864 of the Complaint, and therefore denies the same.

865. The allegations contained in Paragraph 865 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 865 of the Complaint. To the extent the allegations contained in Paragraph 865 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 865 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 865 of the Complaint, and therefore denies the same.

866. The allegations contained in Paragraph 866 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 866 of the Complaint. To the extent the allegations contained in Paragraph 866 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 866 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in

Paragraph 866 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 866 of the Complaint, and therefore denies the same.

867. The allegations contained in Paragraph 867 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 867 of the Complaint. To the extent the allegations contained in Paragraph 867 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 867 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 867 of the Complaint, and therefore denies the same.

868. The allegations contained in Paragraph 868 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 868 of the Complaint. To the extent the allegations contained in Paragraph 868 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 868 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 868 of the Complaint, and therefore denies the same.

869. The allegations contained in Paragraph 869 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 869 of the Complaint. To the extent the allegations contained in Paragraph 869 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 869 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 869 of the Complaint, and therefore denies the same.

870. The allegations contained in Paragraph 870 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 870 of the Complaint. To the extent the allegations contained in Paragraph 870 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 870 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 870 of the Complaint, and therefore denies the same.

871. The allegations contained in Paragraph 871 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 871 of the Complaint. To the extent the allegations contained in Paragraph 871 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 871 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 871 of the Complaint, and therefore denies the same.

872. The allegations contained in Paragraph 872 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 872 of the Complaint. To the extent the allegations contained in Paragraph 872 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 872 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 872 of the Complaint, and therefore denies the same.

873. The allegations contained in Paragraph 873 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 873 of the Complaint. To the extent the allegations contained in Paragraph 873 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 873 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 873 of the Complaint, and therefore denies the same.

874. The allegations contained in Paragraph 874 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 874 of the Complaint. To the extent the allegations contained in Paragraph 874 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 874 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 874 of the Complaint, and therefore denies the same.

875. The allegations contained in Paragraph 875 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 875 of the Complaint. To the extent the allegations contained in Paragraph 875 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 875 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 875 of the Complaint, and therefore denies the same.

876. The allegations contained in Paragraph 876 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 876 of the Complaint. To the extent the allegations contained in Paragraph 876 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 876 of the Complaint, and therefore denies the same.

877. The allegations contained in Paragraph 877 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 877 of the Complaint. To the extent the allegations contained in Paragraph 877 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 877 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 877 of the Complaint, and therefore denies the same.

878. The allegations contained in Paragraph 878 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 878 of the Complaint. To the extent the allegations contained in Paragraph 878 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 878 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 878 of the Complaint, and therefore denies the same.

879. The allegations contained in Paragraph 879 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 879 of the Complaint. To the extent the allegations contained in Paragraph 879 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 879 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 879 of the Complaint, and therefore denies the same.

880. The allegations contained in Paragraph 880 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 880 of the Complaint. To the extent the allegations contained in Paragraph 880 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 880 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 880 of the Complaint, and therefore denies the same.

881. The allegations contained in Paragraph 881 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 881 of the Complaint. To the extent the allegations contained in Paragraph 881 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 881 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 881 of the Complaint, and therefore denies the same.

882. The allegations contained in Paragraph 882 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 882 of the Complaint. To the extent the allegations contained in Paragraph 882 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 882 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 882 of the Complaint, and therefore denies the same.

883. The allegations contained in Paragraph 883 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 883 of the Complaint. To the extent the allegations contained in Paragraph 883 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 883 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 883 of the Complaint, and therefore denies the same.

884. The allegations contained in Paragraph 884 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 884 of the Complaint. To the extent the allegations contained in Paragraph 884 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 884 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant



lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 884 of the Complaint, and therefore denies the same.

**iv. CVS**

885. The allegations contained in Paragraph 885 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 885 of the Complaint. To the extent the allegations contained in Paragraph 885 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 885 of the Complaint, and therefore denies the same.

886. The allegations contained in Paragraph 886 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 886 of the Complaint. To the extent the allegations contained in Paragraph 886 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 886 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 886 of the Complaint, and therefore denies the same.

887. The allegations contained in Paragraph 887 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 887 of the Complaint. To the extent the allegations contained in Paragraph 887 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 887 of the Complaint, and therefore denies the same.

888. The allegations contained in Paragraph 888 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 888 of the Complaint. To the extent the allegations contained in Paragraph 888 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 888 of the Complaint, and therefore denies the same.

889. The allegations contained in Paragraph 889 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 889 of the Complaint. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 889 of the Complaint, and therefore denies the same.

890. The allegations contained in Paragraph 890 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 890 of the Complaint. To the extent the allegations contained in Paragraph 890 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 890 of the Complaint, and therefore denies the same.

891. The allegations contained in Paragraph 891 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 891 of the Complaint. To the extent the allegations contained in Paragraph 891 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 891 of the Complaint, and therefore denies the same.

892. The allegations contained in Paragraph 892 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 892 of the Complaint. To the extent the allegations contained in Paragraph 892 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 892 of the Complaint, and therefore denies the same.

893. The allegations contained in Paragraph 893 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 893 of the Complaint. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 893 of the Complaint, and therefore denies the same.

894. The allegations contained in Paragraph 894 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 894 of the Complaint. To the extent the allegations contained in Paragraph 894 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 894 of the Complaint, and therefore denies the same.

895. The allegations contained in Paragraph 895 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 895 of the Complaint. To the extent the allegations contained in Paragraph 895 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 895 of the Complaint, and therefore denies the same.

896. The allegations contained in Paragraph 896 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 896 of the Complaint. To the extent the allegations contained in Paragraph 896 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 896 of the Complaint, and therefore denies the same.

897. The allegations contained in Paragraph 897 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 897 of the Complaint. To the extent the allegations contained in Paragraph 897 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 897 of the Complaint, and therefore denies the same.

898. The allegations contained in Paragraph 898 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 898 of the Complaint. To the extent the allegations contained in Paragraph 898 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 898 of the Complaint, and therefore denies the same.

899. The allegations contained in Paragraph 899 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 899 of the Complaint. To the extent the allegations contained in Paragraph 899 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 899 of the Complaint, and therefore denies the same.

900. The allegations contained in Paragraph 900 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 900 of the Complaint. To the extent the allegations contained in Paragraph 900 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 900 of the Complaint, and therefore denies the same.

901. The allegations contained in Paragraph 901 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 901 of the Complaint. To the extent the allegations contained in Paragraph 901 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 901 of the Complaint, and therefore denies the same.

902. The allegations contained in Paragraph 902 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 902 of the Complaint. To the extent the allegations contained in Paragraph 902 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 902 of the Complaint, and therefore denies the same.

903. The allegations contained in Paragraph 903 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 903 of the Complaint. To the extent the allegations contained in Paragraph 903 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 903 of the Complaint, and therefore denies the same.

904. The allegations contained in Paragraph 904 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 904 of the Complaint. To the extent the allegations contained in Paragraph 904 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 904 of the Complaint, and therefore denies the same.

905. The allegations contained in Paragraph 905 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 905 of the Complaint. To the extent the allegations contained in Paragraph 905 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 905 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 905 of the Complaint, and therefore denies the same.

906. The allegations contained in Paragraph 906 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 906 of the Complaint. To the extent the allegations contained in Paragraph 906 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 906 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 906 of the Complaint, and therefore denies the same.

907. The allegations contained in Paragraph 907 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 907 of the Complaint. To the extent the allegations contained in Paragraph 907 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 907 of the Complaint, and therefore denies the same.

908. The allegations contained in Paragraph 908 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 908 of the Complaint. To the extent the allegations contained in Paragraph 908 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 908 of the Complaint, and therefore denies the same.

909. The allegations contained in Paragraph 909 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 909 of the Complaint. To the extent the allegations contained in Paragraph 909 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 909 of the Complaint, and therefore denies the same.

910. The allegations contained in Paragraph 910 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 910 of the Complaint. To the extent the allegations contained in Paragraph 910 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 910 of the Complaint, and therefore denies the same.

911. The allegations contained in Paragraph 911 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 911 of the Complaint. To the extent the allegations contained in Paragraph 911 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 911 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 911 of the Complaint, and therefore denies the same.

912. The allegations contained in Paragraph 912 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 912 of the Complaint. To the extent the allegations contained in Paragraph 912 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 912 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 912 of the Complaint, and therefore denies the same.

913. The allegations contained in Paragraph 913 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 913 of the Complaint. To the extent the allegations contained in Paragraph 913 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks



sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 913 of the Complaint, and therefore denies the same.

914. The allegations contained in Paragraph 914 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 914 of the Complaint. To the extent the allegations contained in Paragraph 914 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 914 of the Complaint, and therefore denies the same.

915. The allegations contained in Paragraph 915 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 915 of the Complaint. To the extent the allegations contained in Paragraph 915 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 915 of the Complaint, and therefore denies the same.

916. The allegations contained in Paragraph 916 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 916 of the Complaint. To the extent the allegations contained in Paragraph 916 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 916 of the Complaint, and therefore denies the same.

917. The allegations contained in Paragraph 917 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 917 of the Complaint. To the extent the allegations contained in Paragraph 917 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 917 of the Complaint, and therefore denies the same.

918. The allegations contained in Paragraph 918 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 918 of the Complaint. To the extent the allegations contained in Paragraph 918 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 918 of the Complaint, and therefore denies the same.

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919. The allegations contained in Paragraph 919 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 919 of the Complaint. To the extent the allegations contained in Paragraph 919 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 919 of the Complaint, and therefore denies the same.

920. The allegations contained in Paragraph 920 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 920 of the Complaint. To the extent the allegations contained in Paragraph 920 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 920 of the Complaint, and therefore denies the same.

921. The allegations contained in Paragraph 921 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 921 of the Complaint. To the extent the allegations contained in Paragraph 921 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 921 of the Complaint, and therefore denies the same.

922. The allegations contained in Paragraph 922 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 922 of the Complaint. To the extent the allegations contained in Paragraph 922 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 922 of the Complaint, and therefore denies the same.

923. The allegations contained in Paragraph 923 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 923 of the Complaint. To the extent the allegations contained in Paragraph 923 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 923 of the Complaint, and therefore denies the same.

924. The allegations contained in Paragraph 924 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 924 of the Complaint. To the extent the allegations contained in Paragraph 924 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 924 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 924 of the Complaint, and therefore denies the same.

925. The allegations contained in Paragraph 925 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 925 of the Complaint. To the extent the allegations contained in Paragraph 925 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 925 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 925 of the Complaint, and therefore denies the same.

926. The allegations contained in Paragraph 926 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 926 of the Complaint. To the extent the allegations contained in Paragraph 926 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 926 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 926 of the Complaint, and therefore denies the same.

927. The allegations contained in Paragraph 927 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 927 of the Complaint. To the extent the allegations contained in Paragraph 927 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 927 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 927 of the Complaint, and therefore denies the same.

928. The allegations contained in Paragraph 928 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 928 of the Complaint. To the extent the allegations contained in Paragraph 928 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 928 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 928 of the Complaint, and therefore denies the same.

929. The allegations contained in Paragraph 929 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 929 of the Complaint. To the extent the allegations contained in Paragraph 929 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 929 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 929 of the Complaint, and therefore denies the same.

930. The allegations contained in Paragraph 930 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 930 of the Complaint. To the extent the allegations contained in Paragraph 930 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 930 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 930 of the Complaint, and therefore denies the same.

931. The allegations contained in Paragraph 931 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 931 of the Complaint. To the extent the allegations contained in Paragraph 931 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 931 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 931 of the Complaint, and therefore denies the same.

932. The allegations contained in Paragraph 932 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 932 of the Complaint. To the extent the allegations contained in Paragraph 932 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 932 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 932 of the Complaint, and therefore denies the same.

933. The allegations contained in Paragraph 933 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 933 of the Complaint. To the extent the allegations contained in Paragraph 933 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 933 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 933 of the Complaint, and therefore denies the same.

934. The allegations contained in Paragraph 934 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 934 of the Complaint. To the extent the allegations contained in Paragraph 934 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 934 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 934 of the Complaint, and therefore denies the same.

935. The allegations contained in Paragraph 935 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 935 of the Complaint. To the extent the allegations contained in Paragraph 935 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 935 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 935 of the Complaint, and therefore denies the same.

936. The allegations contained in Paragraph 936 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 936 of the Complaint. To the extent the allegations contained in Paragraph 936 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 936 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 936 of the Complaint, and therefore denies the same.

937. The allegations contained in Paragraph 937 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 937 of the Complaint. To the extent the allegations contained in Paragraph 937 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 937 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 937 of the Complaint, and therefore denies the same.

938. The allegations contained in Paragraph 938 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 938 of the Complaint. To the extent the allegations contained in Paragraph 938 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 938 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 938 of the Complaint, and therefore denies the same.

939. The allegations contained in Paragraph 939 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 939 of the Complaint. To the extent the allegations contained in Paragraph 939 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 939 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and



Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 939 of the Complaint, and therefore denies the same.

940. The allegations contained in Paragraph 940 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 940 of the Complaint. To the extent the allegations contained in Paragraph 940 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 940 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 940 of the Complaint, and therefore denies the same.

941. The allegations contained in Paragraph 941 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 941 of the Complaint. To the extent the allegations contained in Paragraph 941 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 941 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 941 of the Complaint, and therefore denies the same.

942. The allegations contained in Paragraph 942 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 942 of the Complaint. To the extent the allegations contained in Paragraph 942 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 942 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 942 of the Complaint, and therefore denies the same.

943. The allegations contained in Paragraph 943 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 943 of the Complaint. To the extent the allegations contained in Paragraph 943 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 943 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 943 of the Complaint, and therefore denies the same.

944. The allegations contained in Paragraph 944 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant admits only that Defendant distributes controlled substances and other products to Walgreens retail pharmacy locations, and that Walgreens Boots Alliance Holdings LLC is a shareholder of Defendant's parent corporation, AmerisourceBergen Corporation. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 944.

945. The allegations contained in Paragraph 945 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 945 of the Complaint. To the extent the allegations contained in Paragraph 945 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 945 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 945 of the Complaint, and therefore denies the same.

946. The allegations contained in Paragraph 946 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 946 of the Complaint. To the extent the allegations contained in Paragraph 946 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 946 of the Complaint, and therefore denies the same.

947. The allegations contained in Paragraph 947 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 947 of the Complaint. To the extent the allegations contained in Paragraph 947 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 947 of the Complaint, and therefore denies the same.

**vi. H.D. SMITH**

948. The allegations contained in Paragraph 948 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 948 of the Complaint. To the extent the allegations contained in Paragraph 948 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 948 of the Complaint, and therefore denies the same.

949. The allegations contained in Paragraph 949 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 949 of the Complaint. To the extent the allegations contained in Paragraph 949 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent Paragraph 949 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 949 of the Complaint, and therefore denies the same.

950. The allegations contained in Paragraph 950 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 950 of the Complaint. To the extent the allegations contained in Paragraph 950 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 950 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 950 of the Complaint, and therefore denies the same.

951. The allegations contained in Paragraph 951 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 951 of the Complaint. To the extent the allegations contained in Paragraph 951 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 951 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 951 of the Complaint, and therefore denies the same.

952. The allegations contained in Paragraph 952 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 952 of the Complaint. To the extent the allegations contained in Paragraph 952 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent Paragraph 952 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 952 of the Complaint, and therefore denies the same.

953. The allegations contained in Paragraph 953 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 953 of the Complaint. To the extent the allegations contained in Paragraph 953 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 953 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 953 of the Complaint, and therefore denies the same.

954. The allegations contained in Paragraph 954 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 954 of the Complaint. To the extent the allegations contained in Paragraph 954 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 954 of the Complaint, and therefore denies the same.

955. The allegations contained in Paragraph 955 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 955 of the Complaint. To the extent the allegations contained in Paragraph 955 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 955 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 955 of the Complaint, and therefore denies the same.

956. The allegations contained in Paragraph 956 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 956 of the Complaint. To the extent the allegations contained in Paragraph 956 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 956 of the Complaint, and therefore denies the same.

957. The allegations contained in Paragraph 957 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 957 of the Complaint. To the extent the allegations contained in Paragraph 957 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 957 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 957 of the Complaint, and therefore denies the same.

**vii. KROGER**

958. The allegations contained in Paragraph 958 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 958 of the Complaint. To the extent the allegations contained in Paragraph 958 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 958 of the Complaint, and therefore denies the same.

959. The allegations contained in Paragraph 959 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 959 of the Complaint. To the extent the allegations contained in Paragraph 959 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 959 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 959 of the Complaint, and therefore denies the same.

960. The allegations contained in Paragraph 960 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 960 of the Complaint. To the extent the allegations contained in Paragraph 960 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 960 of the Complaint, and therefore denies the same.

961. The allegations contained in Paragraph 961 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 961 of the Complaint. To the extent the allegations contained in Paragraph 961 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 961 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 961 of the Complaint, and therefore denies the same.

962. The allegations contained in Paragraph 962 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 962 of the Complaint. To the extent the allegations contained in Paragraph 962 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 962 of the Complaint, and therefore denies the same.

963. The allegations contained in Paragraph 963 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 963 of the Complaint. To the extent the allegations contained in Paragraph 963 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 963 of the Complaint, and therefore denies the same.

**viii. RITE AID**

964. The allegations contained in Paragraph 964 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 964 of the Complaint. To the extent the allegations contained in Paragraph 964 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 964 of the Complaint, and therefore denies the same.

965. The allegations contained in Paragraph 965 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 965 of the Complaint. To the extent the allegations contained in Paragraph 965 of the Complaint set forth legal arguments and



legal conclusions, no response is required. To the extent Paragraph 965 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 965 of the Complaint, and therefore denies the same.

966. The allegations contained in Paragraph 966 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 966 of the Complaint. To the extent the allegations contained in Paragraph 966 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 966 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 966 of the Complaint, and therefore denies the same.

967. The allegations contained in Paragraph 967 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 967 of the Complaint. To the extent the allegations contained in Paragraph 967 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 967 of the Complaint, and therefore denies the same.

968. The allegations contained in Paragraph 968 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 968 of the Complaint. To the extent the allegations contained in Paragraph 968 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 968 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 968 of the Complaint, and therefore denies the same.

969. The allegations contained in Paragraph 969 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 969 of the Complaint. To the extent the allegations contained in Paragraph 969 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 969 of the Complaint, and therefore denies the same.

970. The allegations contained in Paragraph 970 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 970 of the Complaint. To the extent the allegations contained in Paragraph 970 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 970 of the Complaint, and therefore denies the same.

971. The allegations contained in Paragraph 971 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 971 of the Complaint. To the extent the allegations contained in Paragraph 971 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 971 of the Complaint, and therefore denies the same.

972. The allegations contained in Paragraph 972 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 972 of the Complaint. To the

extent the allegations contained in Paragraph 972 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 972 of the Complaint, and therefore denies the same.

973. The allegations contained in Paragraph 973 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 973 of the Complaint. To the extent the allegations contained in Paragraph 973 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 973 of the Complaint, and therefore denies the same.

974. The allegations contained in Paragraph 974 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 974 of the Complaint. To the extent the allegations contained in Paragraph 974 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 974 of the Complaint, and therefore denies the same.

975. The allegations contained in Paragraph 975 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 975 of the Complaint. To the extent the allegations contained in Paragraph 975 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 975 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 975 of the Complaint, and therefore denies the same.

976. The allegations contained in Paragraph 976 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 976 of the Complaint. To the extent the allegations contained in Paragraph 976 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 976 of the Complaint, and therefore denies the same.

977. The allegations contained in Paragraph 977 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 977 of the Complaint. To the extent the allegations contained in Paragraph 977 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 977 of the Complaint, and therefore denies the same.

978. The allegations contained in Paragraph 978 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 978 of the Complaint. To the extent the allegations contained in Paragraph 978 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 978 of the Complaint, and therefore denies the same.

**ix. WALMART**

979. The allegations contained in Paragraph 979 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 979 of the Complaint. To the extent the allegations contained in Paragraph 979 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 979 of the Complaint, and therefore denies the same.

980. The allegations contained in Paragraph 980 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 980 of the Complaint. To the extent the allegations contained in Paragraph 980 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 980 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 980 of the Complaint, and therefore denies the same.

981. The allegations contained in Paragraph 981 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 981 of the Complaint. To the extent the allegations contained in Paragraph 981 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 981 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 981 of the Complaint, and therefore denies the same.

982. The allegations contained in Paragraph 982 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 982 of the Complaint. To the extent the allegations contained in Paragraph 982 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 982 of the Complaint, and therefore denies the same.

983. The allegations contained in Paragraph 983 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 983 of the Complaint. To the extent the allegations contained in Paragraph 983 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 983 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 983 of the Complaint, and therefore denies the same.

984. The allegations contained in Paragraph 984 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 984 of the Complaint. To the extent the allegations contained in Paragraph 984 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 984 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 984 of the Complaint, and therefore denies the same.

985. The allegations contained in Paragraph 985 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 985 of the Complaint. To the extent the allegations contained in Paragraph 985 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 985 of the Complaint, and therefore denies the same.

986. The allegations contained in Paragraph 986 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 986 of the Complaint. To the extent the allegations contained in Paragraph 986 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 986 of the Complaint, and therefore denies the same.

987. The allegations contained in Paragraph 987 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 987 of the Complaint. To the extent the allegations contained in Paragraph 987 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 987 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 987 of the Complaint, and therefore denies the same.

988. The allegations contained in Paragraph 988 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 988 of the Complaint. To the extent the allegations contained in Paragraph 988 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 988 of the Complaint, and therefore denies the same.

989. The allegations contained in Paragraph 989 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 989 of the Complaint. To the extent the allegations contained in Paragraph 989 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 989 of the Complaint, and therefore denies the same.

990. The allegations contained in Paragraph 990 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 990 of the Complaint. To the extent the allegations contained in Paragraph 990 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 990 of the Complaint, and therefore denies the same.

991. The allegations contained in Paragraph 991 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 991 of the Complaint. To the extent the allegations contained in Paragraph 991 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 991 of the Complaint, and therefore denies the same.

992. The allegations contained in Paragraph 992 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 992 of the Complaint. To the extent the allegations contained in Paragraph 992 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 992 of the Complaint, and therefore denies the same.



**x. MALLINCKRODT**

993. The allegations contained in Paragraph 993 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 993 of the Complaint. To the extent the allegations contained in Paragraph 993 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 993 of the Complaint, and therefore denies the same.

994. The allegations contained in Paragraph 994 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 994 of the Complaint. To the extent the allegations contained in Paragraph 994 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 994 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 994 of the Complaint, and therefore denies the same.

995. The allegations contained in Paragraph 995 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 995 of the Complaint. To the extent the allegations contained in Paragraph 995 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 995 of the Complaint, and therefore denies the same.

996. The allegations contained in Paragraph 996 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 996 of the Complaint. To the

extent the allegations contained in Paragraph 996 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 996 of the Complaint, and therefore denies the same.

997. The allegations contained in Paragraph 997 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 997 of the Complaint. To the extent the allegations contained in Paragraph 997 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 997 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 997 of the Complaint, and therefore denies the same.

998. The allegations contained in Paragraph 998 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 998 of the Complaint. To the extent the allegations contained in Paragraph 998 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 998 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 998 of the Complaint, and therefore denies the same.

999. The allegations contained in Paragraph 999 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 999 of the Complaint. To the extent the allegations contained in Paragraph 999 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 999 of the Complaint, and therefore denies the same.

1000. The allegations contained in Paragraph 1000 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1000 of the Complaint. To the extent the allegations contained in Paragraph 1000 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1000 of the Complaint, and therefore denies the same.

1001. The allegations contained in Paragraph 1001 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1001 of the Complaint. To the extent the allegations contained in Paragraph 1001 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1001 of the Complaint, and therefore denies the same.

1002. The allegations contained in Paragraph 1002 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1002 of the Complaint. To the extent the allegations contained in Paragraph 1002 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1002 of the Complaint, and therefore denies the same.

1003. The allegations contained in Paragraph 1003 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1003 of the Complaint. To the extent the allegations contained in Paragraph 1003 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent Paragraph 1003 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1003 of the Complaint, and therefore denies the same.

1004. The allegations contained in Paragraph 1004 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1004 of the Complaint. To the extent the allegations contained in Paragraph 1004 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1004 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1004 of the Complaint, and therefore denies the same.

1005. The allegations contained in Paragraph 1005 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1005 of the Complaint. To the extent the allegations contained in Paragraph 1005 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1005 of the Complaint, and therefore denies the same.

1006. The allegations contained in Paragraph 1006 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1006 of the Complaint. To the extent the allegations contained in Paragraph 1006 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1006 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1006 of the Complaint, and therefore denies the same.

1007. The allegations contained in Paragraph 1007 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1007 of the Complaint. To the extent the allegations contained in Paragraph 1007 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1007 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1007 of the Complaint, and therefore denies the same.

1008. The allegations contained in Paragraph 1008 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1008 of the Complaint. To the extent the allegations contained in Paragraph 1008 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1008 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1008 of the Complaint, and therefore denies the same.

1009. The allegations contained in Paragraph 1009 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1009 of the Complaint. To the extent the allegations contained in Paragraph 1009 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1009 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1009 of the Complaint, and therefore denies the same.

1010. The allegations contained in Paragraph 1010 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1010 of the Complaint. To the extent the allegations contained in Paragraph 1010 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1010 of the Complaint, and therefore denies the same.

1011. The allegations contained in Paragraph 1011 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1011 of the Complaint. To the extent the allegations contained in Paragraph 1011 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1011 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1011 of the Complaint, and therefore denies the same.

**xi. ACTAVIS**

1012. The allegations contained in Paragraph 1012 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1012 of the Complaint. To the extent the allegations contained in Paragraph 1012 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1012 of the Complaint, and therefore denies the same.

1013. The allegations contained in Paragraph 1013 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1013 of the Complaint. To the extent the allegations contained in Paragraph 1013 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1013 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1013 of the Complaint, and therefore denies the same.

1014. The allegations contained in Paragraph 1014 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1014 of the Complaint. To the extent the allegations contained in Paragraph 1014 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1014 of the Complaint, and therefore denies the same.

1015. The allegations contained in Paragraph 1015 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1015 of the Complaint. To the extent the allegations contained in Paragraph 1015 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1015 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1015 of the Complaint, and therefore denies the same.

1016. The allegations contained in Paragraph 1016 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1016 of the Complaint. To the extent the allegations contained in Paragraph 1016 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1016 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1016 of the Complaint, and therefore denies the same.

1017. The allegations contained in Paragraph 1017 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1017 of the Complaint. To the extent the allegations contained in Paragraph 1017 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1017 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1017 of the Complaint, and therefore denies the same.

1018. The allegations contained in Paragraph 1018 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1018 of the Complaint. To the extent the allegations contained in Paragraph 1018 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1018 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1018 of the Complaint, and therefore denies the same.



1019. The allegations contained in Paragraph 1019 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1019 of the Complaint. To the extent the allegations contained in Paragraph 1019 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1019 of the Complaint, and therefore denies the same.

1020. The allegations contained in Paragraph 1020 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1020 of the Complaint. To the extent the allegations contained in Paragraph 1020 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1020 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1020 of the Complaint, and therefore denies the same.

1021. The allegations contained in Paragraph 1021 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1021 of the Complaint. To the extent the allegations contained in Paragraph 1021 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1021 of the Complaint, and therefore denies the same.

1022. The allegations contained in Paragraph 1022 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1022 of the Complaint. To the extent the allegations contained in Paragraph 1022 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1022 of the Complaint, and therefore denies the same.

**xii. PURDUE**

1023. The allegations contained in Paragraph 1023 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1023 of the Complaint. To the extent the allegations contained in Paragraph 1023 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1023 of the Complaint, and therefore denies the same.

1024. The allegations contained in Paragraph 1024 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1024 of the Complaint. To the extent the allegations contained in Paragraph 1024 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1024 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1024 of the Complaint, and therefore denies the same.

1025. The allegations contained in Paragraph 1025 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1025 of the Complaint. To the extent the allegations contained in Paragraph 1025 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1025 of the Complaint, and therefore denies the same.

1026. The allegations contained in Paragraph 1026 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1026 of the Complaint. To the extent the allegations contained in Paragraph 1026 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1026 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1026 of the Complaint, and therefore denies the same.

1027. The allegations contained in Paragraph 1027 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1027 of the Complaint. To the extent the allegations contained in Paragraph 1027 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1027 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1027 of the Complaint, and therefore denies the same.

**xiii. KVK TECH**

1028. The allegations contained in Paragraph 1028 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1028 of the Complaint. To the extent the allegations contained in Paragraph 1028 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1028 of the Complaint purports

to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1028 of the Complaint, and therefore denies the same.

1029. The allegations contained in Paragraph 1029 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1029 of the Complaint. To the extent the allegations contained in Paragraph 1029 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1029 of the Complaint, and therefore denies the same.

1030. The allegations contained in Paragraph 1030 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1030 of the Complaint. To the extent the allegations contained in Paragraph 1030 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1030 of the Complaint, and therefore denies the same.

1031. The allegations contained in Paragraph 1031 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1031 of the Complaint. To the extent the allegations contained in Paragraph 1031 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1031 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1031 of the Complaint, and therefore denies the same.

1032. The allegations contained in Paragraph 1032 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1032 of the Complaint. To the extent the allegations contained in Paragraph 1032 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1032 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1032 of the Complaint, and therefore denies the same.

1033. The allegations contained in Paragraph 1033 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1033 of the Complaint. To the extent the allegations contained in Paragraph 1033 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1033 of the Complaint, and therefore denies the same.

1034. The allegations contained in Paragraph 1034 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1034 of the Complaint. To the extent the allegations contained in Paragraph 1034 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1034 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1034 of the Complaint, and therefore denies the same.

1035. The allegations contained in Paragraph 1035 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 1035 of the Complaint. To the extent the allegations contained in Paragraph 1035 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1035 of the Complaint, and therefore denies the same.

**xiv. ENDO**

1036. The allegations contained in Paragraph 1036 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1036 of the Complaint. To the extent the allegations contained in Paragraph 1036 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1036 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1036 of the Complaint, and therefore denies the same.

1037. The allegations contained in Paragraph 1037 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1037 of the Complaint. To the extent the allegations contained in Paragraph 1037 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1037 of the Complaint, and therefore denies the same.

1038. The allegations contained in Paragraph 1038 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1038 of the Complaint. To the extent the allegations contained in Paragraph 1038 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent Paragraph 1038 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1038 of the Complaint, and therefore denies the same.

1039. The allegations contained in Paragraph 1039 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1039 of the Complaint. To the extent the allegations contained in Paragraph 1039 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1039 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1039 of the Complaint, and therefore denies the same.

**xv. JANSSEN**

1040. The allegations contained in Paragraph 1040 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1040 of the Complaint. To the extent the allegations contained in Paragraph 1040 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1040 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1040 of the Complaint, and therefore denies the same.

1041. The allegations contained in Paragraph 1041 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 1041 of the Complaint. To the extent the allegations contained in Paragraph 1041 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1041 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1041 of the Complaint, and therefore denies the same.

1042. The allegations contained in Paragraph 1042 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1042 of the Complaint. To the extent the allegations contained in Paragraph 1042 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1042 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1042 of the Complaint, and therefore denies the same.

1043. The allegations contained in Paragraph 1043 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1043 of the Complaint. To the extent the allegations contained in Paragraph 1043 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1043 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1043 of the Complaint, and therefore denies the same.

1044. The allegations contained in Paragraph 1044 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at



Defendant, Defendant denies the allegations contained in Paragraph 1044 of the Complaint. To the extent the allegations contained in Paragraph 1044 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1044 of the Complaint, and therefore denies the same.

**xvi. CEPHALON**

1045. The allegations contained in Paragraph 1045 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1045 of the Complaint. To the extent the allegations contained in Paragraph 1045 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1045 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1045 of the Complaint, and therefore denies the same.

1046. The allegations contained in Paragraph 1046 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1046 of the Complaint. To the extent the allegations contained in Paragraph 1046 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1046 of the Complaint, and therefore denies the same.

1047. The allegations contained in Paragraph 1047 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1047 of the Complaint. To the extent the allegations contained in Paragraph 1047 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent Paragraph 1047 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1047 of the Complaint, and therefore denies the same.

1048. The allegations contained in Paragraph 1048 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1048 of the Complaint. To the extent the allegations contained in Paragraph 1048 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1048 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1048 of the Complaint, and therefore denies the same.

1049. The allegations contained in Paragraph 1049 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1049 of the Complaint. To the extent the allegations contained in Paragraph 1049 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1049 of the Complaint, and therefore denies the same.

1050. The allegations contained in Paragraph 1050 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1050 of the Complaint. To the extent the allegations contained in Paragraph 1050 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1050 of the Complaint, and therefore denies the same.

**xvii. AMNEAL**

1051. The allegations contained in Paragraph 1051 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1051 of the Complaint. To the extent the allegations contained in Paragraph 1051 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1051 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1051 of the Complaint, and therefore denies the same.

1052. The allegations contained in Paragraph 1052 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1052 of the Complaint. To the extent the allegations contained in Paragraph 1052 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1052 of the Complaint, and therefore denies the same.

**xviii. NATIONAL PHARMACIES**

1053. The allegations contained in Paragraph 1053 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1053 of the Complaint. To the extent the allegations contained in Paragraph 1053 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1053 of the Complaint, and therefore denies the same.

1054. The allegations contained in Paragraph 1054 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1054 of the Complaint. To the extent the allegations contained in Paragraph 1054 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1054 of the Complaint, and therefore denies the same.

1055. The allegations contained in Paragraph 1055 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1055 of the Complaint. To the extent the allegations contained in Paragraph 1055 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1055 of the Complaint, and therefore denies the same.

1056. The allegations contained in Paragraph 1056 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1056 of the Complaint. To the extent the allegations contained in Paragraph 1056 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1056 of the Complaint, and therefore denies the same.

1057. The allegations contained in Paragraph 1057 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1057 of the Complaint. To the extent the allegations contained in Paragraph 1057 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1057 of the Complaint, and therefore denies the same.

1058. The allegations contained in Paragraph 1058 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1058 of the Complaint. To the extent the allegations contained in Paragraph 1058 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1058 of the Complaint, and therefore denies the same.

**a. CVS Regulatory Actions**

1059. The allegations contained in Paragraph 1059 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1059 of the Complaint. To the extent the allegations contained in Paragraph 1059 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1059 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1059 of the Complaint, and therefore denies the same.

1060. The allegations contained in Paragraph 1060 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1060 of the Complaint. To the extent the allegations contained in Paragraph 1060 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1060 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1060 of the Complaint, and therefore denies the same.

1061. The allegations contained in Paragraph 1061 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1061 of the Complaint. To the extent the allegations contained in Paragraph 1061 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1061 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1061 of the Complaint, and therefore denies the same.

1062. The allegations contained in Paragraph 1062 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1062 of the Complaint. To the extent the allegations contained in Paragraph 1062 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1062 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1062 of the Complaint, and therefore denies the same.

1063. The allegations contained in Paragraph 1063 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1063 of the Complaint. To the extent the allegations contained in Paragraph 1063 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1063 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1063 of the Complaint, and therefore denies the same.

1064. The allegations contained in Paragraph 1064 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1064 of the Complaint. To the extent the allegations contained in Paragraph 1064 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1064 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1064 of the Complaint, and therefore denies the same.

1065. The allegations contained in Paragraph 1065 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1065 of the Complaint. To the extent the allegations contained in Paragraph 1065 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1065 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1065 of the Complaint, and therefore denies the same.

1066. The allegations contained in Paragraph 1066 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1066 of the Complaint. To the extent the allegations contained in Paragraph 1066 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1066 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1066 of the Complaint, and therefore denies the same.

1067. The allegations contained in Paragraph 1067 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1067 of the Complaint. To the extent the allegations contained in Paragraph 1067 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1067 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1067 of the Complaint, and therefore denies the same.

**b. Walgreens Regulatory Actions**

1068. The allegations contained in Paragraph 1068 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1068 of the Complaint. To the extent the allegations contained in Paragraph 1068 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1068 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1068 of the Complaint, and therefore denies the same.

1069. The allegations contained in Paragraph 1069 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1069 of the Complaint. To the extent the allegations contained in Paragraph 1069 of the Complaint set forth legal arguments and



legal conclusions, no response is required. To the extent Paragraph 1069 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1069 of the Complaint, and therefore denies the same.

1070. The allegations contained in Paragraph 1070 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1070 of the Complaint. To the extent the allegations contained in Paragraph 1070 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1070 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1070 of the Complaint, and therefore denies the same.

1071. The allegations contained in Paragraph 1071 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1071 of the Complaint. To the extent the allegations contained in Paragraph 1071 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1071 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1071 of the Complaint, and therefore denies the same.

1072. The allegations contained in Paragraph 1072 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1072 of the Complaint. To the extent the allegations contained in Paragraph 1072 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent Paragraph 1072 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1072 of the Complaint, and therefore denies the same.

1073. The allegations contained in Paragraph 1073 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1073 of the Complaint. To the extent the allegations contained in Paragraph 1073 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1073 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1073 of the Complaint, and therefore denies the same.

1074. The allegations contained in Paragraph 1074 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1074 of the Complaint. To the extent the allegations contained in Paragraph 1074 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1074 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1074 of the Complaint, and therefore denies the same.

**c. Rite Aid Regulatory Actions**

1075. The allegations contained in Paragraph 1075 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 1075 of the Complaint. To the extent the allegations contained in Paragraph 1075 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1075 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1075 of the Complaint, and therefore denies the same.

1076. The allegations contained in Paragraph 1076 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1076 of the Complaint. To the extent the allegations contained in Paragraph 1076 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1076 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1076 of the Complaint, and therefore denies the same.

**G. Defendants' Violations in Other Jurisdictions Further Exacerbated the Flood of Opioids into the City of Huntington and Cabell County.**

1077. The allegations contained in Paragraph 1077 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 1077 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1077 of the Complaint, and therefore denies the same.

1078. The allegations contained in Paragraph 1078 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent a response is

required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1078 of the Complaint, and therefore denies the same.

1079. The allegations contained in Paragraph 1079 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1079 of the Complaint, and therefore denies the same.

1080. The allegations contained in Paragraph 1080 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 1080 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1080 of the Complaint, and therefore denies the same.

1081. The allegations contained in Paragraph 1081 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1081 of the Complaint, and therefore denies the same.

1082. The allegations contained in Paragraph 1082 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1082 of the Complaint, and therefore denies the same.

1083. The allegations contained in Paragraph 1083 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1083 of the Complaint, and therefore denies the same.

1084. Defendant denies the allegations contained in Paragraph 1084 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1084 of the

Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1084 of the Complaint set forth legal arguments and legal conclusions, no response is required.

**H. Defendants Delayed a Response to the Opioid Crisis by Pretending to Cooperate with Law Enforcement**

1085. Defendant denies the allegations contained in Paragraph 1085 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1085 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1085 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1086. The allegations contained in Paragraph 1086 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1086 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1086 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1087. The allegations contained in Paragraph 1087 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1087 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1087 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1088. The allegations contained in Paragraph 1088 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1088 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1088 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1089. Defendant denies the allegations contained in Paragraph 1089 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1089 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent Paragraph 1089 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1090. The allegations contained in Paragraph 1090 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1090 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1090 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1091. The allegations contained in Paragraph 1091 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1091 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1091 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1092. The allegations contained in Paragraph 1092 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1092 of the Complaint. To the extent the allegations contained in Paragraph 1092 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1092 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1092 of the Complaint, and therefore denies the same.

1093. The allegations contained in Paragraph 1093 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1093 of the Complaint. To the extent the allegations contained in Paragraph 1093 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1093 of the Complaint, and therefore denies the same.

1094. Defendant denies the allegations contained in Paragraph 1094 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1094 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1094 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1094.

**I. Defendants Worked Together to Sustain their Market and Boost their Profits**

**1. Defendants Worked Together to Inflate Quotas**

1095. Defendant denies the allegations contained in Paragraph 1095 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1095 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1095 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1096. The allegations contained in Paragraph 1096 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 1096 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 1096 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1097. The allegations contained in Paragraph 1097 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1097 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 1097 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1098. The allegations contained in Paragraph 1098 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1098 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.



1099. To the extent Paragraph 1099 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Defendant admits only that it provides a variety of services to its customers. Further responding, as a wholesale distributor of prescription medications, Defendant has a limited role in the healthcare supply chain and does not control how medications that it distributes are prescribed, dispensed, or ultimately used. Nor does Defendant promote the prescribing or use of medications, including opioids, to doctors or patients, or determine the appropriate supply of opioids. Defendant has and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. To the extent the allegations contained in Paragraph 1099 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. Except as specifically admitted herein, Defendant denies the remaining allegations in Paragraph 1099 of the Complaint.

1100. To the extent Paragraph 1100 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Defendant admits only that Defendant has purchased pharmaceutical products, including opioids, from drug manufacturers and has distributed them to retail pharmacies only to the extent that those pharmacies are registered with the DEA and licensed in their respective states. Further responding, as a wholesale distributor of prescription medications, Defendant has a limited role in the healthcare supply chain and does not control how medications that it distributes are prescribed, dispensed, or ultimately used. Nor does Defendant promote the prescribing or use of medications, including opioids, to doctors or patients, or determine the appropriate supply of opioids. Defendant has and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. To the extent the allegations contained in Paragraph 1100 of the Complaint are directed to

other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. Except as specifically admitted herein, Defendant denies the remaining allegations in Paragraph 1100 of the Complaint.

1101. To the extent Paragraph 1101 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Defendant admits only that Defendant has purchased pharmaceutical products, including opioids, from drug manufacturers and has distributed them to retail pharmacies only to the extent that those pharmacies are registered with the DEA and licensed in their respective states. Further responding, as a wholesale distributor of prescription medications, Defendant has a limited role in the healthcare supply chain and does not control how medications that it distributes are prescribed, dispensed, or ultimately used. Nor does Defendant promote the prescribing or use of medications, including opioids, to doctors or patients, or determine the appropriate supply of opioids. Defendant has and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. To the extent the allegations contained in Paragraph 1101 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. Except as specifically admitted herein, Defendant denies the remaining allegations in Paragraph 1101 of the Complaint.

1102. Defendant denies the allegations contained in Paragraph 1102 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1102 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1102 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1102 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states

that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1102.

**2. Defendants Worked Together to Shape State and Federal Policy**

1103. Defendant admits only that it is a member of HDA and that HDA is a national organization whose members include pharmaceutical distributors. Defendant denies that it “worked . . . through . . . the HDA” to achieve any illegal or otherwise improper “common purpose.” To the extent the allegations contained in Paragraph 1103 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1103 of the Complaint set forth legal arguments and legal conclusions, no response is required. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1103.

1104. Defendant denies the allegations contained in Paragraph 1104 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1104 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1104 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1104 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1105. The allegations contained in Paragraph 1105 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1105 of the Complaint purports to be based on documents or websites, those documents or websites

speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1105 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1105 of the Complaint, and therefore denies the same.

1106. Defendant denies the allegations contained in Paragraph 1106 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1106 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1106 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1106 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Defendant admits only that it is a member of the Healthcare Distribution Alliance (“HDA”), previously known as the Healthcare Distribution Management Association (“HDMA”), that HDA is a national organization whose members include pharmaceutical distributors. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1106.

1107. Defendant denies the allegations contained in Paragraph 1107 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1107 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1107 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1107 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Defendant admits only that it is a member of the HDA, that HDA is a national organization whose members include pharmaceutical distributors.

Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1107.

1108. Defendant denies the allegations contained in Paragraph 1108 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1108 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1108 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1108 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Defendant admits only that it is a member of the HDA, that HDA is a national organization whose members include pharmaceutical distributors. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1108.

1109. Defendant denies the allegations contained in Paragraph 1109 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1109 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1109 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1109 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1110. Defendant denies the allegations contained in Paragraph 1110 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1110 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1110 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1110 of the Complaint purports to

be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1111. Defendant denies the allegations contained in Paragraph 1111 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1111 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1111 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1111 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Defendant admits only that it is a member of the HDA, that HDA is a national organization whose members include pharmaceutical distributors. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1111.

1112. Defendant denies the allegations contained in Paragraph 1112 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1112 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1112 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1112 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Defendant admits only that it is a member of the HDA, that HDA is a national organization whose members include pharmaceutical distributors. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1112.

1113. The allegations contained in Paragraph 1113 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. Defendant denies the allegations contained in Paragraph 1113 to the extent that they are

directed to Defendant. To the extent the allegations contained in Paragraph 1113 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1114. Defendant denies the allegations contained in Paragraph 1114 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1114 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1114 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1114 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Defendant admits only that it is a member of the HDA, that HDA is a national organization whose members include pharmaceutical distributors. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1114.

1115. Defendant denies the allegations contained in Paragraph 1115 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1115 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1115 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1116. Defendant denies the allegations contained in Paragraph 1116 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1116 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1116 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1117. Defendant denies the allegations contained in Paragraph 1117 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1117 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1117 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1117 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Defendant admits only that it is a member of the HDA, that HDA is a national organization whose members include pharmaceutical distributors. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1117.

1118. Defendant denies the allegations contained in Paragraph 1118 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1118 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1118 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1118 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1118.

1119. Defendant denies the allegations contained in Paragraph 1119 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1119 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to



form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1119 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1120. Defendant denies the allegations contained in Paragraph 1120 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1120 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1120 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1120 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1121. Defendant denies the allegations contained in Paragraph 1121 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1121 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1121 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1121.

1122. The allegations contained in Paragraph 1122 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1122 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. Defendant denies the allegations contained in Paragraph 1122 to the extent that they are directed

to Defendant. To the extent the allegations contained in Paragraph 1122 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1123. Defendant denies the allegations contained in Paragraph 1123 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1123 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1123 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1123 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1124. Defendant denies the allegations contained in Paragraph 1124 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1124 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1124 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1124.

### **3. Distributor Defendants Marketed Manufacturers' Opioid Products**

1125. Defendant denies the allegations contained in Paragraph 1125 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1125 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to

form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1125 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant admits only that Defendant is a wholesale distributor of various prescription medications (as well as over-the-counter medications) and that Defendant has distributed controlled substances, including opioids, to retail pharmacies and other entities located in Cabell County and the City of Huntington only to the extent that those pharmacies and other entities are registered with the DEA and licensed in West Virginia. Defendant has a limited role in the healthcare supply chain and does not control how medications that it distributes are prescribed, dispensed, or ultimately used. Nor does Defendant promote the prescribing or use of medications, including opioids, to doctors or patients, or determine the appropriate supply of opioids. Further, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1125.

1126. Defendant denies the allegations contained in Paragraph 1126 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1126 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1126 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1126 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1127. The allegations contained in Paragraph 1127 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1127 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the

allegations contained in Paragraph 1127 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1128. Defendant denies the allegations contained in Paragraph 1128 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1128 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1128 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1128 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1129. Defendant denies the allegations contained in Paragraph 1129 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1129 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1130. Defendant denies the allegations contained in Paragraph 1130 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1130 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1130 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1130 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the

DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1130.

1131. Defendant denies the allegations contained in Paragraph 1131 to the extent that they are directed to Defendant. The allegations contained in Paragraph 1131 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1131 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 1131 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1132. Defendant denies the allegations contained in Paragraph 1132 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1132 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1132 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1132 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1133. Defendant denies the allegations contained in Paragraph 1133 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1133 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1133 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA.

Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1133.

**J. The PBM Defendants Further Exacerbated the Flood of Opioids into the Market**

1134. The allegations contained in Paragraph 1134 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1134 of the Complaint. To the extent the allegations contained in Paragraph 1134 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1134 of the Complaint, and therefore denies the same.

1135. The allegations contained in Paragraph 1135 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1135 of the Complaint. To the extent the allegations contained in Paragraph 1135 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1135 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1135 of the Complaint, and therefore denies the same.

1136. The allegations contained in Paragraph 1136 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1136 of the Complaint. To the extent the allegations contained in Paragraph 1136 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1136 of the Complaint, and therefore denies the same.

1137. The allegations contained in Paragraph 1137 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1137 of the Complaint. To the extent the allegations contained in Paragraph 1137 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1137 of the Complaint, and therefore denies the same.

1138. The allegations contained in Paragraph 1138 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1138 of the Complaint. To the extent the allegations contained in Paragraph 1138 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1138 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1138 of the Complaint, and therefore denies the same.

1139. The allegations contained in Paragraph 1139 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1139 of the Complaint. To the extent the allegations contained in Paragraph 1139 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1139 of the Complaint, and therefore denies the same.

1140. The allegations contained in Paragraph 1140 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1140 of the Complaint. To the extent the allegations contained in Paragraph 1140 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1140 of the Complaint, and therefore denies the same.

1141. The allegations contained in Paragraph 1141 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1141 of the Complaint. To the extent the allegations contained in Paragraph 1141 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1141 of the Complaint, and therefore denies the same.

1142. The allegations contained in Paragraph 1142 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1142 of the Complaint. To the extent the allegations contained in Paragraph 1142 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1142 of the Complaint, and therefore denies the same.

1143. The allegations contained in Paragraph 1143 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1143 of the Complaint. To the extent the allegations contained in Paragraph 1143 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1143 of the Complaint, and therefore denies the same.

1144. The allegations contained in Paragraph 1144 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1144 of the Complaint. To the



extent the allegations contained in Paragraph 1144 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1144 of the Complaint, and therefore denies the same.

1145. The allegations contained in Paragraph 1145 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1145 of the Complaint. To the extent the allegations contained in Paragraph 1145 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1145 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1145 of the Complaint, and therefore denies the same.

1146. The allegations contained in Paragraph 1146 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1146 of the Complaint. To the extent the allegations contained in Paragraph 1146 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1146 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1146 of the Complaint, and therefore denies the same.

1147. The allegations contained in Paragraph 1147 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1147 of the Complaint. To the extent the allegations contained in Paragraph 1147 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks

sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1147 of the Complaint, and therefore denies the same.

1148. The allegations contained in Paragraph 1148 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1148 of the Complaint. To the extent the allegations contained in Paragraph 1148 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1148 of the Complaint, and therefore denies the same.

**K. Collectively, the Defendants' Actions have had a Devastating Effect on Plaintiffs' Communities**

1149. The allegations contained in Paragraph 1149 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1149 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1149 of the Complaint set forth purported medical and/or expert opinions, no response is required. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1149.

1150. The allegations contained in Paragraph 1150 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1150 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1150 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1150 of the Complaint, and therefore denies the same.

1151. The allegations contained in Paragraph 1151 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1151 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1151.

1152. The allegations contained in Paragraph 1152 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1152 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1152 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1152 of the Complaint, and therefore denies the same.

1153. The allegations contained in Paragraph 1153 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1153 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1153 of the Complaint, and therefore denies the same.

1154. The allegations contained in Paragraph 1154 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1154 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to

the truth of the allegations contained in Paragraph 1154 of the Complaint, and therefore denies the same.

1155. The allegations contained in Paragraph 1155 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1155 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1155 of the Complaint, and therefore denies the same.

1156. The allegations contained in Paragraph 1156 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1156 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1156 of the Complaint, and therefore denies the same.

1157. The allegations contained in Paragraph 1157 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1157 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1157 of the Complaint, and therefore denies the same.

1158. The allegations contained in Paragraph 1158 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1158 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a

response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1158 of the Complaint, and therefore denies the same.

1159. The allegations contained in Paragraph 1159 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1159 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1159 of the Complaint, and therefore denies the same.

1160. The allegations contained in Paragraph 1160 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1160 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1160 of the Complaint, and therefore denies the same.

1161. The allegations contained in Paragraph 1161 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1161 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1161 of the Complaint, and therefore denies the same.

1162. The allegations contained in Paragraph 1162 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1162 of the Complaint purports to be based on documents or websites, those documents or websites

speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1162 of the Complaint, and therefore denies the same.

1163. The allegations contained in Paragraph 1163 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1163 of the Complaint, and therefore denies the same.

1164. The allegations contained in Paragraph 1164 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1164 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1164 of the Complaint, and therefore denies the same.

1165. Defendant denies the allegations contained in Paragraph 1165 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1165 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1165 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1165.

1166. The allegations contained in Paragraph 1166 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 1166 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge

or information to form a belief as to the truth of the allegations contained in Paragraph 1166 of the Complaint, and therefore denies the same.

1167. The allegations contained in Paragraph 1167 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1167 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1167 of the Complaint, and therefore denies the same.

1168. The allegations contained in Paragraph 1168 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1168 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1168 of the Complaint, and therefore denies the same.

1169. The allegations contained in Paragraph 1169 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1169 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1169 of the Complaint, and therefore denies the same.

1170. The allegations contained in Paragraph 1170 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1170 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a

response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1170 of the Complaint, and therefore denies the same.

1171. The allegations contained in Paragraph 1171 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1171 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1171 of the Complaint, and therefore denies the same.

1172. The allegations contained in Paragraph 1172 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1172 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1172 of the Complaint, and therefore denies the same.

1173. The allegations contained in Paragraph 1173 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1173 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1173 of the Complaint, and therefore denies the same.

1174. Defendant denies the allegations contained in Paragraph 1174 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1174 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to



form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1174 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1175. The allegations contained in Paragraph 1175 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1175 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1175 of the Complaint, and therefore denies the same.

1176. The allegations contained in Paragraph 1176 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1176 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1176 of the Complaint, and therefore denies the same.

1177. The allegations contained in Paragraph 1177 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1177 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1177 of the Complaint, and therefore denies the same.

1178. The allegations contained in Paragraph 1178 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1178 of the Complaint purports to be based on documents or websites, those documents or websites

speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1178 of the Complaint, and therefore denies the same.

1179. The allegations contained in Paragraph 1179 of the Complaint set forth legal argument and legal conclusions to which no response is required. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1179.

1180. The allegations contained in Paragraph 1180 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1180 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1180 of the Complaint, and therefore denies the same.

1181. The allegations contained in Paragraph 1181 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1181 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1181 of the Complaint, and therefore denies the same.

1182. The allegations contained in Paragraph 1182 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1182 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to

the truth of the allegations contained in Paragraph 1182 of the Complaint, and therefore denies the same.

1183. The allegations contained in Paragraph 1183 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1183 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1183 of the Complaint, and therefore denies the same.

1184. The allegations contained in Paragraph 1184 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1184 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1184 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1184 of the Complaint, and therefore denies the same.

1185. The allegations contained in Paragraph 1185 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1185 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1185 of the Complaint, and therefore denies the same.

1186. The allegations contained in Paragraph 1186 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1186 of the Complaint purports to be based on documents or websites, those documents or websites

speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1186 of the Complaint, and therefore denies the same.

1187. The allegations contained in Paragraph 1187 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1187 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1187 of the Complaint, and therefore denies the same.

1188. The allegations contained in Paragraph 1188 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1188 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1188 of the Complaint, and therefore denies the same.

1189. The allegations contained in Paragraph 1189 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1189 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1189 of the Complaint, and therefore denies the same.

1190. The allegations contained in Paragraph 1190 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1190

of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1190 of the Complaint, and therefore denies the same.

1191. The allegations contained in Paragraph 1191 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1191 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1191 of the Complaint, and therefore denies the same.

1192. The allegations contained in Paragraph 1192 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1192 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1192 of the Complaint, and therefore denies the same.

1193. The allegations contained in Paragraph 1193 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1193 of the Complaint, and therefore denies the same.

1194. The allegations contained in Paragraph 1194 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1194 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a

response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1194 of the Complaint, and therefore denies the same.

1195. The allegations contained in Paragraph 1195 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1195 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1195 of the Complaint, and therefore denies the same.

1196. The allegations contained in Paragraph 1196 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1196 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1196 of the Complaint, and therefore denies the same.

1197. The allegations contained in Paragraph 1197 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1197 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1197 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1197 of the Complaint, and therefore denies the same.

**L. Statute of Limitations are Tolloed and Defendants Are Estopped From Asserting Statutes of Limitations as Defenses**

**1. Continuing Conduct**

1198. Defendant denies the allegations contained in Paragraph 1198 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1198 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1198 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1199. Defendant denies the allegations contained in Paragraph 1199 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1199 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1199 of the Complaint set forth legal arguments and legal conclusions, no response is required.

**2. Equitable Estoppel and Fraudulent Concealment**

1200. Defendant denies the allegations contained in Paragraph 1200 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1200 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1200 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1201. Defendant denies the allegations contained in Paragraph 1201 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1201 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the

allegations contained in Paragraph 1201 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1202. The allegations contained in Paragraph 1202 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1202 of the Complaint. To the extent the allegations contained in Paragraph 1202 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1202 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1202 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1202 of the Complaint, and therefore denies the same.

1203. Defendant denies the allegations contained in Paragraph 1203 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1203 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1203 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1204. Defendant denies the allegations contained in Paragraph 1204 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1204 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1204 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1205. The allegations contained in Paragraph 1205 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at



Defendant, Defendant denies the allegations contained in Paragraph 1205 of the Complaint. To the extent the allegations contained in Paragraph 1205 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1205 of the Complaint, and therefore denies the same.

1206. Defendant denies the allegations contained in Paragraph 1206 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1206 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1206 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1206 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1206 of the Complaint set forth purported medical and/or expert opinions, no response is required.

1207. Defendant denies the allegations contained in Paragraph 1207 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1207 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1207 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1207 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1207 of the Complaint set forth purported medical and/or expert opinions, no response is required.

1208. The allegations contained in Paragraph 1208 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations

contained in Paragraph 1208 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1208 of the Complaint, and therefore denies the same.

**II. FACTS PERTAINING TO CLAIMS UNDER THE RACKETEER-INFLUENCED AND CORRUPT ORGANIZATIONS (“RICO”) ACT**

**A. The Opioid Marketing Enterprise**

**1. The Common Purpose and Scheme of the Opioid Marketing Enterprise**

1209. The allegations contained in Paragraph 1209 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1209 of the Complaint. To the extent the allegations contained in Paragraph 1209 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1210. The allegations contained in Paragraph 1210 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1210 of the Complaint. To the extent the allegations contained in Paragraph 1210 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1211. The allegations contained in Paragraph 1211 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1211 of the Complaint. To the extent the allegations contained in Paragraph 1211 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 1211 of the Complaint set forth purported medical and/or expert opinions, no response is required.

1212. The allegations contained in Paragraph 1212 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 1212 of the Complaint. To the extent the allegations contained in Paragraph 1212 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1213. The allegations contained in Paragraph 1213 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1213 of the Complaint. To the extent the allegations contained in Paragraph 1213 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1214. The allegations contained in Paragraph 1214 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1214 of the Complaint. To the extent the allegations contained in Paragraph 1214 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1215. The allegations contained in Paragraph 1215 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1215 of the Complaint. To the extent the allegations contained in Paragraph 1215 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1216. The allegations contained in Paragraph 1216 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1216 of the Complaint. To the extent the allegations contained in Paragraph 1216 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 1216 of the Complaint set forth purported medical and/or expert opinions, no response is required.

1217. The allegations contained in Paragraph 1217 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1217 of the Complaint. To the

extent the allegations contained in Paragraph 1217 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1218. The allegations contained in Paragraph 1218 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1218 of the Complaint. To the extent the allegations contained in Paragraph 1218 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 1218 of the Complaint set forth purported medical and/or expert opinions, no response is required.

1219. The allegations contained in Paragraph 1219 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1219 of the Complaint. To the extent the allegations contained in Paragraph 1219 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1219 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1220. The allegations contained in Paragraph 1220 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1220 of the Complaint. To the extent the allegations contained in Paragraph 1220 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1221. The allegations contained in Paragraph 1221 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1221 of the Complaint. To the extent the allegations contained in Paragraph 1221 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 1221 of the Complaint set forth purported medical and/or expert opinions, no response is required.

1222. The allegations contained in Paragraph 1222 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1222 of the Complaint. To the extent the allegations contained in Paragraph 1222 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1223. The allegations contained in Paragraph 1223 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1223 of the Complaint. To the extent the allegations contained in Paragraph 1223 of the Complaint set forth legal arguments and legal conclusions, no response is required.

**2. The Conduct of the Opioid Marketing Enterprise violated Civil RICO**

1224. The allegations contained in Paragraph 1224 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1224 of the Complaint. To the extent the allegations contained in Paragraph 1224 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1224 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1224 of the Complaint set forth purported medical and/or expert opinions, no response is required.

1225. The allegations contained in Paragraph 1225 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1225 of the Complaint. To the extent the allegations contained in Paragraph 1225 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1226. The allegations contained in Paragraph 1226 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1226 of the Complaint. To the extent the allegations contained in Paragraph 1226 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1226 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1226 of the Complaint set forth purported medical and/or expert opinions, no response is required.

1227. The allegations contained in Paragraph 1227 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1227 of the Complaint. To the extent the allegations contained in Paragraph 1227 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1227 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1227 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1227 of the Complaint, and therefore denies the same.

1228. The allegations contained in Paragraph 1228 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1228 of the Complaint. To the extent the allegations contained in Paragraph 1228 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1228 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in

Paragraph 1228 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1228 of the Complaint, and therefore denies the same.

1229. The allegations contained in Paragraph 1229 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1229 of the Complaint. To the extent the allegations contained in Paragraph 1229 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1229 of the Complaint, and therefore denies the same.

**3. The RICO Marketing Defendants Controlled and Paid Front Groups and KOLs to Promote and Maximize Opioid Use**

1230. The allegations contained in Paragraph 1230 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1230 of the Complaint. To the extent the allegations contained in Paragraph 1230 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 1230 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1230 of the Complaint, and therefore denies the same.

1231. The allegations contained in Paragraph 1231 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1231 of the Complaint. To the extent the allegations contained in Paragraph 1231 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1231 of the Complaint, and therefore denies the same.

1232. The allegations contained in Paragraph 1232 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1232 of the Complaint. To the extent the allegations contained in Paragraph 1232 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1232 of the Complaint, and therefore denies the same.

1233. The allegations contained in Paragraph 1233 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1233 of the Complaint. To the extent the allegations contained in Paragraph 1233 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1233 of the Complaint, and therefore denies the same.

1234. The allegations contained in Paragraph 1234 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1234 of the Complaint. To the extent the allegations contained in Paragraph 1234 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1234 of the Complaint, and therefore denies the same.

1235. The allegations contained in Paragraph 1235 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1235 of the Complaint. To the extent the allegations contained in Paragraph 1235 of the Complaint set forth legal arguments



and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 1235 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1235 of the Complaint, and therefore denies the same.

1236. The allegations contained in Paragraph 1236 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1236 of the Complaint. To the extent the allegations contained in Paragraph 1236 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1236 of the Complaint, and therefore denies the same.

1237. The allegations contained in Paragraph 1237 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1237 of the Complaint. To the extent the allegations contained in Paragraph 1237 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 1237 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1237 of the Complaint, and therefore denies the same.

1238. The allegations contained in Paragraph 1238 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1238 of the Complaint. To the extent the allegations contained in Paragraph 1238 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 1238 of the Complaint set forth purported medical and/or expert opinions, no response is required.

To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1238 of the Complaint, and therefore denies the same.

1239. The allegations contained in Paragraph 1239 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1239 of the Complaint. To the extent the allegations contained in Paragraph 1239 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1239 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1239 of the Complaint set forth purported medical and/or expert opinions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1239 of the Complaint, and therefore denies the same.

1240. The allegations contained in Paragraph 1240 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1240 of the Complaint. To the extent the allegations contained in Paragraph 1240 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1240 of the Complaint, and therefore denies the same.

1241. The allegations contained in Paragraph 1241 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1241 of the Complaint. To the extent the allegations contained in Paragraph 1241 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1241 of the Complaint, and therefore denies the same.

1242. The allegations contained in Paragraph 1242 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1242 of the Complaint. To the extent the allegations contained in Paragraph 1242 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1242 of the Complaint, and therefore denies the same.

1243. The allegations contained in Paragraph 1243 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1243 of the Complaint. To the extent the allegations contained in Paragraph 1243 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1243 of the Complaint, and therefore denies the same.

1244. The allegations contained in Paragraph 1244 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1244 of the Complaint. To the extent the allegations contained in Paragraph 1244 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1244 of the Complaint, and therefore denies the same.

**B. The Opioid Supply Chain Enterprise**

1245. Defendant denies the allegations contained in Paragraph 1245 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1245 of the

Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1245 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1245 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1245.

1246. Defendant denies the allegations contained in Paragraph 1246 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1246 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1246 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1246 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1247. The allegations contained in Paragraph 1247 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 1247 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 1247 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the

distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1247.

1248. Defendant denies the allegations contained in Paragraph 1248 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1248 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1248 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1248 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1248.

1249. Defendant denies the allegations contained in Paragraph 1249 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1249 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1249 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1250. Defendant denies the allegations contained in Paragraph 1250 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1250 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the

allegations contained in Paragraph 1250 of the Complaint set forth legal arguments and legal conclusions, no response is required. Defendant admits only that it is a member of the HDA, and that the HDA is a national organization whose members include pharmaceutical distributors. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1250.

1251. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1251 of the Complaint, and therefore denies the same. To the extent the allegations contained in Paragraph 1251 of the Complaint set forth legal arguments and legal conclusions, no response is required. Defendant admits only that it is a member of the HDA, and that the HDA is a national organization whose members include pharmaceutical distributors. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1251.

1252. Defendant denies the allegations contained in Paragraph 1252 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1252 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1252 of the Complaint set forth legal arguments and legal conclusions, no response is required. Defendant admits only that it is a member of the HDA, that the HDA is a national organization whose members include pharmaceutical distributors, and that various AmerisourceBergen employees have served on one or more HDA committees over the years. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1252.

1253. Defendant denies the allegations contained in Paragraph 1253 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1253 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the

allegations contained in Paragraph 1253 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1254. Defendant denies the allegations contained in Paragraph 1254 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1254 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1254 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1255. Defendant denies the allegations contained in Paragraph 1255 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1255 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1255 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1255 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Defendant admits only that it is a member of the HDA, and that the HDA is a national organization whose members include pharmaceutical distributors. Further, Defendant admits that in 2007 the DEA temporarily suspended the license of one of its Florida distribution centers to distribute controlled substances. Defendant states that the DEA reinstated the suspended license shortly thereafter. Defendant further states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Defendant further incorporates by reference its responses to Paragraphs 710 to 713. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1255.

1256. Defendant denies the allegations contained in Paragraph 1256 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1256 of the

Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1256 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1256 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1257. The allegations contained in Paragraph 1257 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1257 of the Complaint set forth legal arguments and legal conclusions, no response is required. Defendant denies the allegations contained in Paragraph 1257 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1257 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1258. Defendant denies the allegations contained in Paragraph 1258 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1258 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1258 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1258 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1259. Defendant denies the allegations contained in Paragraph 1259 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1259 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1259 of the Complaint set forth legal arguments and legal



conclusions, no response is required. To the extent Paragraph 1259 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1260. Defendant denies the allegations contained in Paragraph 1260 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1260 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1260 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1260 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant admits only that it is a member of HDA, previously known as HDMA, and that HDMA previously issued recommended guidelines for pharmaceutical system distribution integrity. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1260.

1261. Defendant denies the allegations contained in Paragraph 1261 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1261 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1261 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1261 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant admits only that it is a member of HDA, previously known as HDMA, and that HDMA previously issued recommended guidelines for pharmaceutical system distribution integrity. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1261.

1262. Defendant denies the allegations contained in Paragraph 1262 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1262 of the

Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1262 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1262 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Defendant admits only that it is a member of the HDA, previously known as HDMA, and that HDMA previously issued recommended guidelines for pharmaceutical system distribution integrity. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1262.

1263. Defendant denies the allegations contained in Paragraph 1263 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1263 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1263 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1263 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant admits only that it is a member of HDA, previously known as HDMA, and that HDMA previously issued recommended guidelines for pharmaceutical system distribution integrity. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1263.

1264. Defendant denies the allegations contained in Paragraph 1264 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1264 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1264 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1264 of the Complaint purports to

be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1265. Defendant denies the allegations contained in Paragraph 1265 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1265 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1265 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1265 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1266. Defendant admits only that various AmerisourceBergen employees have served on one or more HDA committees over the years and that those employees may have attended certain in-person or telephonic meetings held by those committees from time to time. To the extent the allegations contained in Paragraph 1266 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1266 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1266 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent Paragraph 1266 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1266.

1267. Defendant admits only that various AmerisourceBergen employees have served on one or more HDA committees over the years and that those employees may have attended certain in-person or telephonic meetings held by those committees from time to time. To the extent the allegations contained in Paragraph 1267 of the Complaint are directed to other parties, Defendant

lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1267 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1267 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1267.

1268. Defendant admits only that various AmerisourceBergen employees have served on one or more HDA committees over the years and that those employees may have attended certain in-person or telephonic meetings held by those committees from time to time. To the extent the allegations contained in Paragraph 1268 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1268 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1268 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1268.

1269. Defendant admits only that various AmerisourceBergen employees have served on one or more HDA committees over the years and that those employees may have attended certain in-person or telephonic meetings held by those committees from time to time. To the extent the allegations contained in Paragraph 1269 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1269 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1269 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1269.

1270. Defendant admits only that various AmerisourceBergen employees have served on one or more HDA committees over the years and that those employees may have attended certain in-person or telephonic meetings held by those committees from time to time. To the extent the allegations contained in Paragraph 1270 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1270 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1270 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1270.

1271. Defendant admits only that various AmerisourceBergen employees have served on one or more HDA committees over the years and that those employees may have attended certain in-person or telephonic meetings held by those committees from time to time. To the extent the allegations contained in Paragraph 1271 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1271 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1271 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1267.

1272. Defendant denies the allegations contained in Paragraph 1272 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1272 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1272 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1272 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. Defendant admits only that it is a member of the HDA, and that the HDA is a national organization whose members include pharmaceutical distributors. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1272.

1273. Defendant denies the allegations contained in Paragraph 1273 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1273 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1273 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1273 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1274. Defendant denies the allegations contained in Paragraph 1274 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1274 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1274 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1274 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Defendant admits only that it is a member of the HDA, and that the HDA is a national organization whose members include pharmaceutical distributors. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1274.

1275. Defendant denies the allegations contained in Paragraph 1275 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1275 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the

allegations contained in Paragraph 1275 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1275 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1276. Defendant denies the allegations contained in Paragraph 1276 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1276 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1276 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1276 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1277. Defendant admits only that various AmerisourceBergen employees have served on one or more HDA committees over the years and that those employees may have attended certain in-person or telephonic meetings held by those committees from time to time. To the extent the allegations contained in Paragraph 1277 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1277 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1277 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1277.

1278. The allegations contained in Paragraph 1278 of the Complaint are based on documents or websites, which speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1278 of the Complaint set forth legal arguments and legal conclusions, no response is required. Defendant denies the allegations contained in Paragraph 1278 to the extent that they are directed to Defendant. To the extent the

allegations contained in Paragraph 1278 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1279. Defendant admits only that various AmerisourceBergen employees have served on one or more HDA committees over the years and that those employees may have attended certain in-person or telephonic meetings held by those committees from time to time. To the extent the allegations contained in Paragraph 1279 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent Paragraph 1279 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1279 of the Complaint set forth legal arguments and legal conclusions, no response is required. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1279.

1280. Defendant admits only that various AmerisourceBergen employees have served on one or more HDA committees over the years and that those employees may have attended certain in-person or telephonic meetings held by those committees from time to time. To the extent the allegations contained in Paragraph 1280 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent Paragraph 1280 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1280 of the Complaint set forth legal arguments and legal conclusions, no response is required. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1280.

1281. Defendant admits only that various AmerisourceBergen employees have served on one or more HDA committees over the years and that those employees may have attended certain in-person or telephonic meetings held by those committees from time to time. To the extent the allegations contained in Paragraph 1281 of the Complaint are directed to other parties, Defendant



lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent Paragraph 1281 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1281 of the Complaint set forth legal arguments and legal conclusions, no response is required. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 128`.

1282. Defendant admits only that various AmerisourceBergen employees have served on one or more HDA committees over the years and that those employees may have attended certain in-person or telephonic meetings held by those committees from time to time. To the extent the allegations contained in Paragraph 1282 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent Paragraph 1282 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1282 of the Complaint set forth legal arguments and legal conclusions, no response is required. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1282.

1283. Defendant admits only that various AmerisourceBergen employees have served on one or more HDA committees over the years and that those employees may have attended certain in-person or telephonic meetings held by those committees from time to time. To the extent the allegations contained in Paragraph 1283 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. Except To the extent Paragraph 1283 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1283 of the Complaint set forth legal arguments and legal conclusions, no response is required. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1283.

1284. Defendant admits only that various AmerisourceBergen employees have served on one or more HDA committees over the years and that those employees may have attended certain in-person or telephonic meetings held by those committees from time to time. To the extent the allegations contained in Paragraph 1284 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent Paragraph 1284 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1284 of the Complaint set forth legal arguments and legal conclusions, no response is required. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1284.

1285. Defendant admits only that various AmerisourceBergen employees have served on one or more HDA committees over the years and that those employees may have attended certain in-person or telephonic meetings held by those committees from time to time. To the extent the allegations contained in Paragraph 1285 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent Paragraph 1285 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1285 of the Complaint set forth legal arguments and legal conclusions, no response is required. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1285.

1286. Defendant admits only that various AmerisourceBergen employees have served on one or more HDA committees over the years and that those employees may have attended certain in-person or telephonic meetings held by those committees from time to time. To the extent the allegations contained in Paragraph 1286 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent Paragraph 1286 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies

any characterization of the same. To the extent the allegations contained in Paragraph 1286 of the Complaint set forth legal arguments and legal conclusions, no response is required. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1286.

1287. Defendant denies the allegations contained in Paragraph 1287 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1287 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1287 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1287.

1288. Defendant denies the allegations contained in Paragraph 1288 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1288 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1288 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1288.

1289. Defendant denies the allegations contained in Paragraph 1289 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1289 of the

Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1289 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1289.

1290. Defendant denies the allegations contained in Paragraph 1290 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1290 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1290 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1290.

1291. Defendant denies the allegations contained in Paragraph 1291 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1291 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1291 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1292. Defendant denies the allegations contained in Paragraph 1292 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1292 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1292 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant admits only that Defendant is a wholesale distributor of various prescription medications (as well as over-the-counter medications) and that Defendant has distributed controlled substances, including opioids, to retail pharmacies and other entities located in Cabell County and the City of Huntington only to the extent that those pharmacies and other entities are registered with the DEA and licensed in West Virginia. Defendant further states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1292.

1293. Defendant denies the allegations contained in Paragraph 1293 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1293 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1293 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1293.

1294. Defendant denies the allegations contained in Paragraph 1294 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1294 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1294 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1294.

1295. Defendant denies the allegations contained in Paragraph 1295 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1295 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1295 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1295.

1296. Defendant denies the allegations contained in Paragraph 1296 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1296 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1296 of the Complaint set forth legal arguments and legal

conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1296.

1297. Defendant denies the allegations contained in Paragraph 1297 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1297 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1297 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1298. Defendant denies the allegations contained in Paragraph 1298 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1298 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1298 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1299. Defendant denies the allegations contained in Paragraph 1299 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1299 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1299 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1300. Defendant denies the allegations contained in Paragraph 1300 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1300 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to

form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1300 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1300 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1301. Defendant denies the allegations contained in Paragraph 1301 to the extent that they are directed to Defendant. The allegations contained in Paragraph 1301 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 1301 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1302. Defendant denies the allegations contained in Paragraph 1302 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1302 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1302 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1302 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1302.

1303. Defendant denies the allegations contained in Paragraph 1303 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1303 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the



allegations contained in Paragraph 1303 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1303.

1304. Defendant denies the allegations contained in Paragraph 1304 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1304 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1304 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1305. Defendant denies the allegations contained in Paragraph 1305 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1305 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1305 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1306. Defendant denies the allegations contained in Paragraph 1306 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1306 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1306 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1307. Defendant denies the allegations contained in Paragraph 1307 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1307 of the

Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1307 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1308. Defendant denies the allegations contained in Paragraph 1308 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1308 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1308 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1309. Defendant denies the allegations contained in Paragraph 1309 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1309 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1309 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1309 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1310. Defendant denies the allegations contained in Paragraph 1310 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1310 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1310 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1310 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1311. Defendant denies the allegations contained in Paragraph 1311 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1311 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1311 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1311 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1312. Defendant denies the allegations contained in Paragraph 1312 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1312 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1312 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1312 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1313. Defendant denies the allegations contained in Paragraph 1313 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1313 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1313 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1313 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1314. Defendant denies the allegations contained in Paragraph 1314 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1314 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to

form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1314 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1314 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1315. Defendant denies the allegations contained in Paragraph 1315 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1315 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1315 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1315 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent Paragraph 1315 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1316. Defendant denies the allegations contained in Paragraph 1316 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1316 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1316 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1316 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent Paragraph 1316 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1317. Defendant denies the allegations contained in Paragraph 1317 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1317 of the

Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1317 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1317 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1318. Defendant denies the allegations contained in Paragraph 1318 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1318 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1318 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1318 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1319. Defendant denies the allegations contained in Paragraph 1319 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1319 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1319 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1320. Defendant denies the allegations contained in Paragraph 1320 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1320 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1320 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1320 of the Complaint purports to

be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1321. Defendant denies the allegations contained in Paragraph 1321 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1321 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1321 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1321 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1322. Defendant denies the allegations contained in Paragraph 1322 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1322 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1322 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1323. Defendant denies the allegations contained in Paragraph 1323 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1323 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1323 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1324. Defendant denies the allegations contained in Paragraph 1324 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1324 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1324 of the Complaint set forth legal arguments and legal

conclusions, no response is required. To the extent Paragraph 1324 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1325. Defendant denies the allegations contained in Paragraph 1325 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1325 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1325 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1325 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1326. Defendant admits only that Defendant is a wholesale distributor of various prescription medications (as well as over-the-counter medications) and that Defendant has distributed controlled substances, including opioids, to retail pharmacies and other entities located in Cabell County and the City of Huntington only to the extent that those pharmacies and other entities are registered with the DEA and licensed in West Virginia. To the extent the allegations contained in Paragraph 1326 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1326 of the Complaint set forth legal arguments and legal conclusions, no response is required. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1326.

1327. Defendant denies the allegations contained in Paragraph 1327 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1327 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1327 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant

has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1327.

1328. Defendant denies the allegations contained in Paragraph 1328 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1328 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1328 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1328.

1329. Defendant denies the allegations contained in Paragraph 1329 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1329 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1329 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1329 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1330. Defendant denies the allegations contained in Paragraph 1330 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1330 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to



form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1330 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1330 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1331. Defendant denies the allegations contained in Paragraph 1331 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1331 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1331 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1331 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1331.

1332. Defendant denies the allegations contained in Paragraph 1332 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1332 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1332 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1332 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1333. Defendant denies the allegations contained in Paragraph 1333 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1333 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1333 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1334. Defendant denies the allegations contained in Paragraph 1334 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1334 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1334 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1335. Defendant denies the allegations contained in Paragraph 1335 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1335 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1335 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1335 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1335.

1336. Defendant denies the allegations contained in Paragraph 1336 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1336 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1336 of the Complaint set forth legal arguments and legal

conclusions, no response is required. To the extent Paragraph 1336 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent Paragraph 1336 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1336.

1337. Defendant denies the allegations contained in Paragraph 1337 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1337 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1337 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1338. Defendant denies the allegations contained in Paragraph 1338 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1338 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1338 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1338.

1339. Defendant denies the allegations contained in Paragraph 1339 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1339 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1339 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1339 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1339.

1340. Defendant denies the allegations contained in Paragraph 1340 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1340 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1340 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1340 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1341. The allegations contained in Paragraph 1341 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 1341 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 1341 of the Complaint are directed to other parties,

Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1342. Defendant denies the allegations contained in Paragraph 1342 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1342 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1342 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1342.

1343. Defendant denies the allegations contained in Paragraph 1343 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1343 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1343 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1343 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant admits that it is a member of HDA, previously known as HDMA, and that HDMA previously issued recommended guidelines for pharmaceutical system distribution integrity. Defendant further states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities,

including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1343.

1344. Defendant denies the allegations contained in Paragraph 1344 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1344 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1344 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1344.

1345. Defendant denies the allegations contained in Paragraph 1345 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1345 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1345 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1345.

1346. Defendant denies the allegations contained in Paragraph 1346 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1346 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to

form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1346 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1346 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1346.

1347. Defendant denies the allegations contained in Paragraph 1347 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1347 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1347 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1347 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1348. The allegations contained in Paragraph 1348 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 1348 of the Complaint set forth legal arguments and legal conclusions, no response is required. Defendant denies the allegations contained in Paragraph 1348 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1348 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1349. Defendant denies the allegations contained in Paragraph 1349 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1349 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1349 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1349.

1350. Defendant denies the allegations contained in Paragraph 1350 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1350 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1350 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1350.

1351. Defendant denies the allegations contained in Paragraph 1351 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1351 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the



allegations contained in Paragraph 1351 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1352. Defendant denies the allegations contained in Paragraph 1352 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1352 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1352 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1353. Defendant denies the allegations contained in Paragraph 1353 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1353 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1353 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1353 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent Paragraph 1353 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1354. Defendant denies the allegations contained in Paragraph 1354 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1354 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1354 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1354 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1355. Defendant admits only that Defendant is a wholesale distributor of various prescription medications (as well as over-the-counter medications) and that Defendant has distributed controlled substances, including opioids, to retail pharmacies and other entities located in Cabell County and the City of Huntington only to the extent that those pharmacies and other entities are registered with the DEA and licensed in West Virginia. To the extent the allegations contained in Paragraph 1355 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1355 of the Complaint set forth legal arguments and legal conclusions, no response is required. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1355.

1356. Defendant denies the allegations contained in Paragraph 1356 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1356 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1356 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1356.

1357. Defendant denies the allegations contained in Paragraph 1357 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1357 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1357 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant

has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1357.

1358. Defendant denies the allegations contained in Paragraph 1358 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1358 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1358 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1359. Defendant denies the allegations contained in Paragraph 1359 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1359 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1359 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1360. Defendant denies the allegations contained in Paragraph 1360 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1360 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1360 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA.

Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1360.

1361. Defendant denies the allegations contained in Paragraph 1361 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1361 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1361 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1361 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1362. Defendant denies the allegations contained in Paragraph 1362 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1362 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1362 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1363. Defendant denies the allegations contained in Paragraph 1363 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1363 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1363 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1364. Defendant denies the allegations contained in Paragraph 1364 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1364 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1364 of the Complaint set forth legal arguments and legal

conclusions, no response is required. By way of further response, Defendant incorporates by reference its answer to Paragraph 1. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1364.

1365. Defendant denies the allegations contained in Paragraph 1365 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1365 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1365 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1365 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1365.

1366. Defendant denies the allegations contained in Paragraph 1366 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1366 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1366 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1367. Defendant denies the allegations contained in Paragraph 1367 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1367 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1367 of the Complaint set forth legal arguments and legal

conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1367.

**C. Facts pertaining to Punitive Damages**

1368. Defendant denies the allegations contained in Paragraph 1368 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1368 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1368 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1369. Defendant denies the allegations contained in Paragraph 1369 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1369 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1369 of the Complaint set forth legal arguments and legal conclusions, no response is required. By way of further response, Defendant states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1369.

1370. Defendant denies the allegations contained in Paragraph 1370 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1370 of the

Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1370 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1371. Defendant denies the allegations contained in Paragraph 1371 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1371 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1371 of the Complaint set forth legal arguments and legal conclusions, no response is required.

**1. The Marketing Defendants Persisted in Their Fraudulent Scheme Despite Repeated Admonitions, Warnings, and Even Prosecutions**

1372. The allegations contained in Paragraph 1372 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1372 of the Complaint. To the extent the allegations contained in Paragraph 1372 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1372 of the Complaint, and therefore denies the same.

**a. FDA Warnings to Janssen Failed to Deter Janssen's Misleading Promotion of Duragesic**

1373. The allegations contained in Paragraph 1373 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1373 of the Complaint. To the extent the allegations contained in Paragraph 1373 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1373 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and

Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1373 of the Complaint, and therefore denies the same.

1374. The allegations contained in Paragraph 1374 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1374 of the Complaint. To the extent the allegations contained in Paragraph 1374 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1374 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1374 of the Complaint, and therefore denies the same.

1375. The allegations contained in Paragraph 1375 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1375 of the Complaint. To the extent the allegations contained in Paragraph 1375 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1375 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1375 of the Complaint, and therefore denies the same.

**b. Governmental Action, Including Large Monetary Fines, Failed to Stop Cephalon from Falsely Marketing Actiq for Off-Label Uses**

1376. The allegations contained in Paragraph 1376 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1376 of the Complaint. To the extent the allegations contained in Paragraph 1376 of the Complaint set forth legal arguments and



legal conclusions, no response is required. To the extent Paragraph 1376 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1376 of the Complaint, and therefore denies the same.

1377. The allegations contained in Paragraph 1377 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1377 of the Complaint. To the extent the allegations contained in Paragraph 1377 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1377 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1377 of the Complaint, and therefore denies the same.

**c. FDA Warnings Did Not Prevent Cephalon from Continuing False and Off-Label Marketing of Fentora**

1378. The allegations contained in Paragraph 1378 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1378 of the Complaint. To the extent the allegations contained in Paragraph 1378 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1378 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1378 of the Complaint, and therefore denies the same.

1379. The allegations contained in Paragraph 1379 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 1379 of the Complaint. To the extent the allegations contained in Paragraph 1379 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1379 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1379 of the Complaint, and therefore denies the same.

1380. The allegations contained in Paragraph 1380 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1380 of the Complaint. To the extent the allegations contained in Paragraph 1380 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1380 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1380 of the Complaint, and therefore denies the same.

**d. A Guilty Plea and a Large Fine Did Not Deter Purdue from Continuing Its Fraudulent Marketing of OxyContin**

1381. The allegations contained in Paragraph 1381 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1381 of the Complaint. To the extent the allegations contained in Paragraph 1381 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1381 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1381 of the Complaint, and therefore denies the same.

1382. The allegations contained in Paragraph 1382 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1382 of the Complaint. To the extent the allegations contained in Paragraph 1382 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1382 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1382 of the Complaint, and therefore denies the same.

**2. Repeated Admonishments and Fines Did Not Stop Defendants from Ignoring Their Obligations to Control the Supply Chain and Prevent Diversion**

1383. Defendant denies the allegations contained in Paragraph 1383 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1383 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1383 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1384. Defendant denies the allegations contained in Paragraph 1384 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1384 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1384 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1384 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1385. Defendant denies the allegations contained in Paragraph 1385 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1385 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1385 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1385 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1386. Defendant denies the allegations contained in Paragraph 1386 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1386 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1386 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1386 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. Further, Defendant admits that in 2007 the DEA temporarily suspended the license of one of its Florida distribution centers to distribute controlled substances. Defendant states that the DEA reinstated the suspended license shortly thereafter. Defendant further states that Defendant has complied and continues to comply with its legal obligations in connection with the distribution of controlled substances, including but not limited to, its obligations to identify and report suspicious orders to the appropriate federal and state government entities, including the DEA. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1386.

1387. The allegations contained in Paragraph 1387 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1387 of the Complaint. To the extent the allegations contained in Paragraph 1387 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent Paragraph 1387 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1387 of the Complaint, and therefore denies the same.

1388. The allegations contained in Paragraph 1388 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1388 of the Complaint. To the extent the allegations contained in Paragraph 1388 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1388 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1388 of the Complaint, and therefore denies the same.

1389. The allegations contained in Paragraph 1389 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1389 of the Complaint. To the extent the allegations contained in Paragraph 1389 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1389 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1389 of the Complaint, and therefore denies the same.

1390. The allegations contained in Paragraph 1390 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1390 of the Complaint. To the extent the allegations contained in Paragraph 1390 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent Paragraph 1390 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1390 of the Complaint, and therefore denies the same.

1391. The allegations contained in Paragraph 1391 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1391 of the Complaint. To the extent the allegations contained in Paragraph 1391 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1391 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1391 of the Complaint, and therefore denies the same.

1392. The allegations contained in Paragraph 1392 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1392 of the Complaint. To the extent the allegations contained in Paragraph 1392 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1392 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1392 of the Complaint, and therefore denies the same.

1393. The allegations contained in Paragraph 1393 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1393 of the Complaint. To the extent the allegations contained in Paragraph 1393 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent Paragraph 1393 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1393 of the Complaint, and therefore denies the same.

1394. The allegations contained in Paragraph 1394 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1394 of the Complaint. To the extent the allegations contained in Paragraph 1394 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1394 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1394 of the Complaint, and therefore denies the same.

1395. The allegations contained in Paragraph 1395 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1395 of the Complaint. To the extent the allegations contained in Paragraph 1395 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1395 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1395 of the Complaint, and therefore denies the same.

1396. The allegations contained in Paragraph 1396 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1396 of the Complaint. To the extent the allegations contained in Paragraph 1396 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent Paragraph 1396 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1396 of the Complaint, and therefore denies the same.

1397. The allegations contained in Paragraph 1397 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1397 of the Complaint. To the extent the allegations contained in Paragraph 1397 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1397 of the Complaint, and therefore denies the same.

1398. The allegations contained in Paragraph 1398 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1398 of the Complaint. To the extent the allegations contained in Paragraph 1398 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1398 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1398 of the Complaint, and therefore denies the same.

1399. The allegations contained in Paragraph 1399 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1399 of the Complaint. To the extent the allegations contained in Paragraph 1399 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks



sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1399 of the Complaint, and therefore denies the same.

1400. Defendant denies the allegations contained in Paragraph 1400 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1400 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1400 of the Complaint set forth legal arguments and legal conclusions, no response is required.

### **CLAIMS FOR RELIEF**

#### **FIRST CLAIM FOR RELIEF**

##### **Common Law Public Nuisance (Against All Defendants)**

1401. Defendant repeats and realleges Defendant's answers to the allegations contained in Paragraphs 1 through 1400 of the Complaint as if fully set forth herein.

1402. Defendant denies the allegations contained in Paragraph 1402 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1402 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1402 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1403. Defendant denies the allegations contained in Paragraph 1403 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1403 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1403 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1404. Defendant denies the allegations contained in Paragraph 1404 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1404 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1404 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1404 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent Paragraph 1404 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1405. Defendant denies the allegations contained in Paragraph 1405 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1405 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1405 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1406. Defendant denies the allegations contained in Paragraph 1406 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1406 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1406 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1407. Defendant denies the allegations contained in Paragraph 1407 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1407 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1407 of the Complaint set forth legal arguments and legal

conclusions, no response is required. To the extent Paragraph 1407 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent Paragraph 1407 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1408. Defendant denies the allegations contained in Paragraph 1408 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1408 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1408 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1408 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent Paragraph 1408 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1409. Defendant denies the allegations contained in Paragraph 1409 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1409 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1409 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1409 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent Paragraph 1409 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1410. Defendant denies the allegations contained in Paragraph 1410 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1410 of the

Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1410 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1411. Defendant denies the allegations contained in Paragraph 1411 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1411 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1411 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1412. Defendant denies the allegations contained in Paragraph 1412 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1412 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1412 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1413. Defendant denies the allegations contained in Paragraph 1413 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1413 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1413 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1414. Defendant denies the allegations contained in Paragraph 1414 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1414 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the

allegations contained in Paragraph 1414 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1415. Defendant denies the allegations contained in Paragraph 1415 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1415 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1415 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1416. Defendant denies the allegations contained in Paragraph 1416 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1416 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1416 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1417. Defendant denies the allegations contained in Paragraph 1417 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1417 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1417 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1418. Defendant denies the allegations contained in Paragraph 1418 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1418 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1418 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 1418 of the Complaint set forth purported medical and/or expert opinions, no response is required.

1419. Defendant denies the allegations contained in Paragraph 1419 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1419 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1419 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1420. Defendant denies the allegations contained in Paragraph 1420 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1420 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1420 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1420 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1421. Defendant denies the allegations contained in Paragraph 1421 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1421 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1421 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1421 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1422. Defendant denies the allegations contained in Paragraph 1422 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1422 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the

allegations contained in Paragraph 1422 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1423. Defendant denies the allegations contained in Paragraph 1423 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1423 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1423 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1424. The allegations contained in Paragraph 1424 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1424 of the Complaint. To the extent the allegations contained in Paragraph 1424 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1424 of the Complaint, and therefore denies the same.

1425. The allegations contained in Paragraph 1425 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1425 of the Complaint. To the extent the allegations contained in Paragraph 1425 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1425 of the Complaint, and therefore denies the same.

1426. The allegations contained in Paragraph 1426 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1426 of the Complaint. To the extent the allegations contained in Paragraph 1426 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1426 of the Complaint purports

to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1426 of the Complaint, and therefore denies the same.

1427. Defendant denies the allegations contained in Paragraph 1427 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1427 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1427 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1428. Defendant denies the allegations contained in Paragraph 1428 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1428 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1428 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 1428 of the Complaint set forth purported medical and/or expert opinions, no response is required.

1429. Defendant denies the allegations contained in Paragraph 1429 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1429 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1429 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1430. Defendant denies the allegations contained in Paragraph 1430 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1430 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the



allegations contained in Paragraph 1430 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1431. The allegations contained in Paragraph 1431 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1431 of the Complaint. To the extent the allegations contained in Paragraph 1431 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1431 of the Complaint, and therefore denies the same.

1432. The allegations contained in Paragraph 1432 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1432 of the Complaint. To the extent the allegations contained in Paragraph 1432 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1432 of the Complaint, and therefore denies the same.

1433. Defendant denies the allegations contained in Paragraph 1433 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1433 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1433 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1434. Defendant denies the allegations contained in Paragraph 1434 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1434 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the

allegations contained in Paragraph 1434 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1435. Defendant denies the allegations contained in Paragraph 1435 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1435 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1435 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1436. Defendant denies the allegations contained in Paragraph 1436 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1436 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1436 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1437. Defendant denies the allegations contained in Paragraph 1437 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1437 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1437 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1438. Defendant denies the allegations contained in Paragraph 1438 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1438 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1438 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1439. Defendant denies the allegations contained in Paragraph 1439 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1439 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1439 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1440. Defendant denies the allegations contained in Paragraph 1440 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1440 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1440 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1441. Defendant denies the allegations contained in Paragraph 1441 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1441 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1441 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1442. Defendant denies the allegations contained in Paragraph 1442 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1442 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1442 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1443. Defendant denies the allegations contained in Paragraph 1443 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1443 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to

form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1443 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1444. Defendant denies the allegations contained in Paragraph 1444 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1444 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1444 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1445. Defendant denies the allegations contained in Paragraph 1445 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1445 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1445 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1446. Defendant denies the allegations contained in Paragraph 1446 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1446 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1446 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1447. Defendant denies the allegations contained in Paragraph 1447 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1447 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1447 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1448. Defendant denies the allegations contained in Paragraph 1448 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1448 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1448 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1449. Defendant denies the allegations contained in Paragraph 1449 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1449 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1449 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1450. Defendant denies the allegations contained in Paragraph 1450 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1450 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1450 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1450 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

#### **SECOND CLAIM FOR RELIEF**

#### **Violation of RICO, 18 U.S.C. § 1961 *et seq.* – Opioid Marketing Enterprise (Against Defendants Purdue, Cephalon, Janssen, Endo, and Mallinckrodt (the “RICO Marketing Defendants”))**

1451. Defendant repeats and realleges Defendant’s answers to the allegations contained in Paragraphs 1 through 1450 of the Complaint as if fully set forth herein.

1452. The allegations contained in Paragraph 1452 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1452 of the Complaint. To the extent the allegations contained in Paragraph 1452 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1452 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1452 of the Complaint, and therefore denies the same.

1453. The allegations contained in Paragraph 1453 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1453 of the Complaint. To the extent the allegations contained in Paragraph 1453 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1453 of the Complaint, and therefore denies the same.

1454. The allegations contained in Paragraph 1454 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1454 of the Complaint. To the extent the allegations contained in Paragraph 1454 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1454 of the Complaint, and therefore denies the same.

1455. The allegations contained in Paragraph 1455 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1455 of the Complaint. To the extent the allegations contained in Paragraph 1455 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1455 of the Complaint, and therefore denies the same.

1456. The allegations contained in Paragraph 1456 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1456 of the Complaint. To the extent the allegations contained in Paragraph 1456 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1456 of the Complaint, and therefore denies the same.

1457. The allegations contained in Paragraph 1457 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1457 of the Complaint. To the extent the allegations contained in Paragraph 1457 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1457 of the Complaint, and therefore denies the same.

1458. The allegations contained in Paragraph 1458 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1458 of the Complaint. To the extent the allegations contained in Paragraph 1458 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1458 of the Complaint, and therefore denies the same.

1459. The allegations contained in Paragraph 1459 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1459 of the Complaint. To the

extent the allegations contained in Paragraph 1459 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1459 of the Complaint, and therefore denies the same.

1460. The allegations contained in Paragraph 1460 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1460 of the Complaint. To the extent the allegations contained in Paragraph 1460 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1460 of the Complaint, and therefore denies the same.

1461. The allegations contained in Paragraph 1461 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1461 of the Complaint. To the extent the allegations contained in Paragraph 1461 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1461 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1461 of the Complaint, and therefore denies the same.

1462. The allegations contained in Paragraph 1462 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1462 of the Complaint. To the extent the allegations contained in Paragraph 1462 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1462 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required,



Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1462 of the Complaint, and therefore denies the same.

1463. The allegations contained in Paragraph 1463 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1463 of the Complaint. To the extent the allegations contained in Paragraph 1463 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1463 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1463 of the Complaint, and therefore denies the same.

1464. The allegations contained in Paragraph 1464 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1464 of the Complaint. To the extent the allegations contained in Paragraph 1464 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1464 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1464 of the Complaint, and therefore denies the same.

1465. The allegations contained in Paragraph 1465 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1465 of the Complaint. To the extent the allegations contained in Paragraph 1465 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1465 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant

lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1465 of the Complaint, and therefore denies the same.

1466. The allegations contained in Paragraph 1466 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1466 of the Complaint. To the extent the allegations contained in Paragraph 1466 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1466 of the Complaint, and therefore denies the same.

1467. The allegations contained in Paragraph 1467 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1467 of the Complaint. To the extent the allegations contained in Paragraph 1467 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1467 of the Complaint, and therefore denies the same.

1468. The allegations contained in Paragraph 1468 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1468 of the Complaint. To the extent the allegations contained in Paragraph 1468 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1468 of the Complaint, and therefore denies the same.

1469. The allegations contained in Paragraph 1469 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1469 of the Complaint. To the extent the allegations contained in Paragraph 1469 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1469 of the Complaint, and therefore denies the same.

1470. The allegations contained in Paragraph 1470 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1470 of the Complaint. To the extent the allegations contained in Paragraph 1470 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1470 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1470 of the Complaint, and therefore denies the same.

1471. The allegations contained in Paragraph 1471 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1471 of the Complaint. To the extent the allegations contained in Paragraph 1471 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1471 of the Complaint, and therefore denies the same.

1472. The allegations contained in Paragraph 1472 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1472 of the Complaint. To the extent the allegations contained in Paragraph 1472 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1472 of the Complaint, and therefore denies the same.

1473. The allegations contained in Paragraph 1473 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1473 of the Complaint. To the extent the allegations contained in Paragraph 1473 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1473 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1473 of the Complaint, and therefore denies the same.

1474. The allegations contained in Paragraph 1474 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1474 of the Complaint. To the extent the allegations contained in Paragraph 1474 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1474 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1474 of the Complaint, and therefore denies the same.

1475. The allegations contained in Paragraph 1475 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1475 of the Complaint. To the extent the allegations contained in Paragraph 1475 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1475 of the Complaint, and therefore denies the same.

1476. The allegations contained in Paragraph 1476 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at

Defendant, Defendant denies the allegations contained in Paragraph 1476 of the Complaint. To the extent the allegations contained in Paragraph 1476 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1476 of the Complaint, and therefore denies the same.

1477. The allegations contained in Paragraph 1477 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1477 of the Complaint. To the extent the allegations contained in Paragraph 1477 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1477 of the Complaint, and therefore denies the same.

1478. The allegations contained in Paragraph 1478 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1478 of the Complaint. To the extent the allegations contained in Paragraph 1478 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1478 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1478 of the Complaint, and therefore denies the same.

### **THIRD CLAIM FOR RELIEF**

#### **Violation of RICO, 18 U.S.C. § 1961 *et seq.* – Opioid Supply Chain Enterprise (Against Defendants Purdue, Cephalon, Endo, Mallinckrodt, Actavis, McKesson, Cardinal Health, and AmerisourceBergen (the “RICO Supply Chain Defendants”))**

1479. Defendant repeats and realleges Defendant’s answers to the allegations contained in Paragraphs 1 through 1478 of the Complaint as if fully set forth herein.

1480. The allegations contained in Paragraph 1480 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 1480 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1480 of the Complaint, and therefore denies the same.

1481. Defendant denies the allegations contained in Paragraph 1481 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1481 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1481 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1481 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1482. Defendant denies the allegations contained in Paragraph 1482 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1482 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1482 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1482 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1483. Defendant denies the allegations contained in Paragraph 1483 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1483 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the

allegations contained in Paragraph 1483 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1484. Defendant denies the allegations contained in Paragraph 1484 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1484 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1484 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1484 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1485. Defendant denies the allegations contained in Paragraph 1485 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1485 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1485 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1485 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1486. Defendant denies the allegations contained in Paragraph 1486 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1486 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1486 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1486 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1487. Defendant denies the allegations contained in Paragraph 1487 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1487 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1487 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1487 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1488. Defendant denies the allegations contained in Paragraph 1488 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1488 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1488 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1488 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1489. Defendant denies the allegations contained in Paragraph 1489 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1489 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1489 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1489 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent Paragraph 1489 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.



1490. Defendant denies the allegations contained in Paragraph 1490 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1490 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1490 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1491. Defendant denies the allegations contained in Paragraph 1491 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1491 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1491 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1491 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1492. Defendant denies the allegations contained in Paragraph 1492 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1492 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1492 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1493. Defendant denies the allegations contained in Paragraph 1493 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1493 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1493 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1494. Defendant denies the allegations contained in Paragraph 1494 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1494 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1494 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1495. Defendant denies the allegations contained in Paragraph 1495 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1495 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1495 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1496. Defendant denies the allegations contained in Paragraph 1496 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1496 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1496 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1497. Defendant denies the allegations contained in Paragraph 1497 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1497 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1497 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1498. Defendant denies the allegations contained in Paragraph 1498 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1498 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to

form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1498 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1499. Defendant denies the allegations contained in Paragraph 1499 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1499 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1499 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1500. Defendant denies the allegations contained in Paragraph 1500 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1500 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1500 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1501. Defendant denies the allegations contained in Paragraph 1501 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1501 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1501 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1501 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1502. Defendant denies the allegations contained in Paragraph 1502 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1502 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the

allegations contained in Paragraph 1502 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1503. Defendant denies the allegations contained in Paragraph 1503 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1503 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1503 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1504. Defendant denies the allegations contained in Paragraph 1504 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1504 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1504 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1504 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1505. Defendant denies the allegations contained in Paragraph 1505 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1505 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1505 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1506. Defendant denies the allegations contained in Paragraph 1506 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1506 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the

allegations contained in Paragraph 1506 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1507. Defendant denies the allegations contained in Paragraph 1507 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1507 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1507 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1508. Defendant denies the allegations contained in Paragraph 1508 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1508 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1508 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1509. Defendant denies the allegations contained in Paragraph 1509 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1509 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1509 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1510. Defendant denies the allegations contained in Paragraph 1510 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1510 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1510 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1510 of the Complaint purports to

be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

**FOURTH CLAIM FOR RELIEF**

**Negligence  
(Against Supply Chain Defendants)**

1511. Defendant repeats and realleges Defendant's answers to the allegations contained in Paragraphs 1 through 1510 of the Complaint as if fully set forth herein.

1512. The allegations contained in Paragraph 1512 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 1512 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1513. The allegations contained in Paragraph 1513 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent the allegations contained in Paragraph 1513 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1514. The allegations contained in Paragraph 1514 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1514 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 1514 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1515. The allegations contained in Paragraph 1515 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1515 of the Complaint purports to be based on state or federal laws or regulations, those laws and

regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 1515 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1516. The allegations contained in Paragraph 1516 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1516 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 1516 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1517. Defendant denies the allegations contained in Paragraph 1517 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1517 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1517 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1518. Defendant denies the allegations contained in Paragraph 1518 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1518 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1518 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1519. The allegations contained in Paragraph 1519 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1519 of the Complaint. To the extent the allegations contained in Paragraph 1519 of the Complaint set forth legal arguments and

legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1519 of the Complaint, and therefore denies the same.

1520. Defendant denies the allegations contained in Paragraph 1520 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1520 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1520 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1521. Defendant denies the allegations contained in Paragraph 1521 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1521 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1521 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1522. Defendant denies the allegations contained in Paragraph 1522 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1522 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1522 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1523. Defendant denies the allegations contained in Paragraph 1523 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1523 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1523 of the Complaint set forth legal arguments and legal conclusions, no response is required.



1524. Defendant denies the allegations contained in Paragraph 1524 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1524 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1524 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1525. Defendant denies the allegations contained in Paragraph 1525 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1525 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1525 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1526. Defendant denies the allegations contained in Paragraph 1526 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1526 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent Paragraph 1526 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1526 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1527. Defendant denies the allegations contained in Paragraph 1527 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1527 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1527 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1528. Defendant denies the allegations contained in Paragraph 1528 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1528 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1528 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1529. Defendant denies the allegations contained in Paragraph 1529 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1529 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1529 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1530. Defendant denies the allegations contained in Paragraph 1530 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1530 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1530 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 1530 of the Complaint set forth purported medical and/or expert opinions, no response is required.

1531. Defendant denies the allegations contained in Paragraph 1531 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1531 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1531 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1532. The allegations contained in Paragraph 1532 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any

characterizations of the same. To the extent the allegations contained in Paragraph 1532 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 1532 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1533. The allegations contained in Paragraph 1533 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 1533 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 1533 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1534. The allegations contained in Paragraph 1534 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 1534 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 1534 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1535. The allegations contained in Paragraph 1535 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1535 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 1535 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1536. The allegations contained in Paragraph 1536 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 1536 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 1536 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1537. The allegations contained in Paragraph 1537 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent Paragraph 1537 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same. To the extent Paragraph 1537 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same. To the extent the allegations contained in Paragraph 1537 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1538. Defendant denies the allegations contained in Paragraph 1538 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1538 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1538 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1538 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1539. Defendant denies the allegations contained in Paragraph 1539 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1539 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to

form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1539 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1539 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1540. Defendant denies the allegations contained in Paragraph 1540 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1540 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1540 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1540 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1541. Defendant denies the allegations contained in Paragraph 1541 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1541 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1541 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1541 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1542. The allegations contained in Paragraph 1542 of the Complaint are based on state or federal laws or regulations, which speak for themselves, and Defendant denies any characterizations of the same. To the extent the allegations contained in Paragraph 1542 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent the allegations contained in Paragraph 1542 of the Complaint are directed to other parties,

Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same.

1543. Defendant denies the allegations contained in Paragraph 1543 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1543 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1543 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1543 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1544. Defendant denies the allegations contained in Paragraph 1544 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1544 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1544 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1544 of the Complaint purports to be based on documents or websites, those documents or websites speak for themselves, and Defendant denies any characterization of the same.

1545. Defendant denies the allegations contained in Paragraph 1545 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1545 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1545 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1546. Defendant denies the allegations contained in Paragraph 1546 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1546 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to

form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1546 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1546 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1547. Defendant denies the allegations contained in Paragraph 1547 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1547 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1547 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1548. Defendant denies the allegations contained in Paragraph 1548 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1548 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1548 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1549. Defendant denies the allegations contained in Paragraph 1549 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1549 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1549 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1550. Defendant denies the allegations contained in Paragraph 1550 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1550 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the

allegations contained in Paragraph 1550 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1551. Defendant denies the allegations contained in Paragraph 1551 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1551 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1551 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1552. Defendant denies the allegations contained in Paragraph 1552 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1552 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1552 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1553. Defendant denies the allegations contained in Paragraph 1553 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1553 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1553 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1554. Defendant denies the allegations contained in Paragraph 1554 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1554 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1554 of the Complaint set forth legal arguments and legal conclusions, no response is required.



1555. Defendant denies the allegations contained in Paragraph 1555 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1555 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1555 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1556. Defendant denies the allegations contained in Paragraph 1556 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1556 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1556 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1557. Defendant denies the allegations contained in Paragraph 1557 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1557 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1557 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1557 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

#### **FIFTH CLAIM FOR RELIEF**

#### **Violation of West Virginia Controlled Substances Act; W.Va. Code Section § 55-7-9 (Against Supply Chain Defendants)**

1558. Defendant repeats and realleges Defendant's answers to the allegations contained in Paragraphs 1 through 1557 of the Complaint as if fully set forth herein.

1559. Defendant denies the allegations contained in Paragraph 1559 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1559 of the

Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1559 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1559 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1560. Defendant denies the allegations contained in Paragraph 1560 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1560 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1560 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1560 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1561. Defendant denies the allegations contained in Paragraph 1561 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1561 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1561 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1562. Defendant denies the allegations contained in Paragraph 1562 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1562 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1562 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1563. Defendant denies the allegations contained in Paragraph 1563 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1563 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1563 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1564. Defendant denies the allegations contained in Paragraph 1564 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1564 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1564 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1565. Defendant denies the allegations contained in Paragraph 1565 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1565 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1565 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1566. Defendant denies the allegations contained in Paragraph 1566 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1566 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1566 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1566 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

1567. Defendant denies the allegations contained in Paragraph 1567 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1567 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1567 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1568. Defendant denies the allegations contained in Paragraph 1568 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1568 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1568 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1569. Defendant denies the allegations contained in Paragraph 1569 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1569 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1569 of the Complaint set forth legal arguments and legal conclusions, no response is required. To the extent Paragraph 1569 of the Complaint purports to be based on state or federal laws or regulations, those laws and regulations speak for themselves, and Defendant denies any characterizations of the same.

#### **SIXTH CLAIM FOR RELIEF**

##### **Unjust Enrichment (Against Supply Chain Defendants, National Pharmacies, Purdue Officers and Directors, and PBMs)**

1570. Defendant repeats and realleges Defendant's answers to the allegations contained in Paragraphs 1 through 1569 of the Complaint as if fully set forth herein.

1571. Defendant denies the allegations contained in Paragraph 1571 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1571 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1571 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1572. The allegations contained in Paragraph 1572 of the Complaint set forth legal argument and legal conclusions to which no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1572 of the Complaint, and therefore denies the same.

1573. Defendant denies the allegations contained in Paragraph 1573 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1573 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1573 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1574. Defendant denies the allegations contained in Paragraph 1574 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1574 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1574 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1575. Defendant denies the allegations contained in Paragraph 1575 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1575 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the

allegations contained in Paragraph 1575 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1576. Defendant denies the allegations contained in Paragraph 1576 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1576 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1576 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1577. Defendant denies the allegations contained in Paragraph 1577 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1577 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1577 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1578. Defendant denies the allegations contained in Paragraph 1578 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1578 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1578 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1579. Defendant denies the allegations contained in Paragraph 1579 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1579 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1579 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1580. Defendant denies the allegations contained in Paragraph 1580 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1580 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1580 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1581. Defendant denies the allegations contained in Paragraph 1581 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1581 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1581 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1582. Defendant denies the allegations contained in Paragraph 1582 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1582 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1582 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1583. Defendant denies the allegations contained in Paragraph 1583 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1583 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1583 of the Complaint set forth legal arguments and legal conclusions, no response is required.

**SEVENTH CLAIM FOR RELIEF**

**Civil Conspiracy  
(Against Supply Chain Defendants)**

1584. Defendant repeats and realleges Defendant's answers to the allegations contained in Paragraphs 1 through 1583 of the Complaint as if fully set forth herein.

1585. Defendant denies the allegations contained in Paragraph 1585 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1585 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1585 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1586. Defendant denies the allegations contained in Paragraph 1586 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1586 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1586 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1587. Defendant denies the allegations contained in Paragraph 1587 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1587 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1587 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1588. The allegations contained in Paragraph 1588 of the Complaint are directed to other parties, and thus no response is required of Defendant. To the extent they are directed at Defendant, Defendant denies the allegations contained in Paragraph 1588 of the Complaint. To the extent the allegations contained in Paragraph 1588 of the Complaint set forth legal arguments and



legal conclusions, no response is required. To the extent a response is required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1588 of the Complaint, and therefore denies the same.

1589. Defendant denies the allegations contained in Paragraph 1589 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1589 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1589 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1590. Defendant denies the allegations contained in Paragraph 1590 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1590 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1590 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1591. Defendant denies the allegations contained in Paragraph 1591 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1591 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1591 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1592. Defendant denies the allegations contained in Paragraph 1592 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1592 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1592 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1593. Defendant denies the allegations contained in Paragraph 1593 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1593 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1593 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1594. Defendant denies the allegations contained in Paragraph 1594 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1594 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1594 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1595. Defendant denies the allegations contained in Paragraph 1595 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1595 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1595 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1596. Defendant denies the allegations contained in Paragraph 1596 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1596 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1596 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1597. Defendant denies the allegations contained in Paragraph 1597 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1597 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to

form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1597 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1598. Defendant denies the allegations contained in Paragraph 1598 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1598 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1598 of the Complaint set forth legal arguments and legal conclusions, no response is required.

#### **EIGHTH CLAIM FOR RELIEF**

##### **Punitive Damages (Against All Defendants)**

1599. Defendant repeats and realleges Defendant's answers to the allegations contained in Paragraphs 1 through 1598 of the Complaint as if fully set forth herein.

1600. Defendant denies the allegations contained in Paragraph 1600 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1600 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1600 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1601. Defendant denies the allegations contained in Paragraph 1601 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1601 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1601 of the Complaint set forth legal arguments and legal conclusions, no response is required.

1602. Defendant denies the allegations contained in Paragraph 1602 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1602 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1602 of the Complaint set forth legal arguments and legal conclusions, no response is required.

#### **PRAYER FOR RELIEF**

1603. Defendant denies the allegations contained in Paragraph 1603 to the extent that they are directed to Defendant. To the extent the allegations contained in Paragraph 1603 of the Complaint are directed to other parties, Defendant lacks knowledge or information sufficient to form a belief as to the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 1603 of the Complaint set forth legal arguments and legal conclusions, no response is required. Further answering, Defendant admits only that Plaintiff purports to seek the relief identified in Paragraph 1603 of the Complaint, but denies that Plaintiff is entitled to any relief that it seeks. Except as specifically admitted herein, Defendant denies the remaining allegations of Paragraph 1603.

#### **AFFIRMATIVE DEFENSES**

By asserting the defenses set forth below, Defendant does not allege or admit that it has the burden of proof and/or the burden of persuasion with respect to any of these defenses. All of the following defenses are pled in the alternative and none constitutes an admission that Defendant is in any way liable to Plaintiffs, that Plaintiffs have been or will be injured or damaged in any way, or that Plaintiffs are entitled to any relief whatsoever. Upon completion of discovery, if the facts warrant, Defendant may withdraw one or more of these defenses.

Defendant asserts as follows:

1. Plaintiffs' Complaint fails to state a claim upon which relief may be granted, fails to state facts sufficient to constitute the purported causes of action, and fails to plead a legally cognizable injury.

2. Plaintiffs have failed to plead that they reimbursed any prescriptions for an opioid distributed by Defendant that harmed patients and should not have been written, or that Defendant's allegedly improper conduct caused any healthcare provider to write any ineffective or harmful opioid prescription, which Defendant then distributed.

3. Plaintiffs have failed to join one or more necessary and indispensable parties, including, but not limited to, the DEA, healthcare providers, prescribers, patients, and other third parties whom Plaintiffs allege engaged in the prescription, dispensing, diversion or use of the subject prescription medications.

4. To the extent Plaintiffs are alleging fraud, fraudulent concealment, or similar conduct, Plaintiffs have failed to plead the allegations with sufficient particularity.

5. Plaintiffs cannot obtain relief on their claims based on actions undertaken by Defendant of which Defendant provided notice of all material facts.

6. Plaintiffs fail to plead any actionable misrepresentation or omission made by or attributable to Defendant.

7. Plaintiffs' claims against Defendant do not arise out of the same transactions or occurrences as their claims against other defendants, as required for joinder of parties.

8. Plaintiffs have failed to comply with the requirement that they identify each patient in whose claim(s) they have a subrogation interest and on whose behalf it has incurred costs.

9. Plaintiffs' claims are barred and should be dismissed because Plaintiffs have failed to comply with the Court's case management orders, including CMO-1.

10. Plaintiffs are precluded from recovering against Defendant pursuant to applicable law following section 402A of the Restatement (Second) of Torts.

11. Plaintiffs' recovery is barred under Section 6(c) of the Restatement (Third) of Torts.

12. Plaintiffs' claims are barred in whole or in part because no conduct of Defendant was misleading, unfair, or deceptive.

13. Defendant appropriately, completely, and fully discharged any and all obligations and legal duties arising out of the matters alleged in the Complaint.

14. Plaintiffs' claim for unjust enrichment is barred or limited because Defendant did not receive and retain any alleged benefit from Plaintiffs.

15. Plaintiffs' claims are barred, in whole or in part, by the free public services doctrine and/or the municipal cost recovery rule.

16. Plaintiffs' claims are barred, in whole or in part, because Plaintiffs have no private right of action under the relevant laws and regulations.

17. Defendant did not owe or breach any statutory or common law duty to Plaintiffs.

18. Plaintiffs are barred from recovery against Defendant because Defendant complied with all applicable federal and West Virginia state rules and regulations related to distribution of the subject prescription medications.

19. Plaintiffs' claims and damages are barred or limited, in whole or in part, by common law, statutory, and state constitutional constraints on the exercise of police powers by a municipality.

20. Plaintiffs are barred from recovery by application of the informed consent doctrine.

21. Plaintiffs' claims are barred, in whole or in part, by the applicable statutes of limitations.

22. Plaintiffs' claims are barred, in whole or in part, by the applicable statute of repose.
23. Plaintiffs' claims are not ripe, and/or have been mooted.
24. Plaintiffs' claims are barred, in whole or in part, by the equitable doctrines of laches, waiver, unclean hands, *in pari delicto*, and/or ratification.
25. Venue may be improper and/or inconvenient in this Court.
26. This Court lacks subject matter jurisdiction over all or some of the claims asserted by the Plaintiffs.
27. Plaintiffs' claims are barred, in whole or in part, for lack of standing.
28. Plaintiffs' claims are barred because Plaintiffs are not the real party in interest.
29. Plaintiffs' claims against Defendant are barred by the doctrines of res judicata and collateral estoppel.
30. Plaintiffs may be barred by the doctrine of estoppel from all forms of relief sought in the Complaint.
31. Plaintiffs' claims are barred because Plaintiffs lack capacity to bring their claims, including claims indirectly maintained on behalf of their citizens and claims brought as *parens patriae*.
32. Plaintiffs' claims are barred to the extent they are based on alleged violations of industry customs because purported industry customs do not create legal duties on Defendant.
33. Plaintiffs are barred from recovery by the Assumption of Risk doctrine.
34. Plaintiffs are barred from recovery by application of the learned intermediary doctrine set forth at Section 55-7-30 of the West Virginia Code.
35. Plaintiffs' claims are barred or limited by the terms and effect of any applicable Consent Judgment, including by operation of the doctrines of res judicata and collateral estoppel,

failure to fulfill conditions precedent, failure to provide requisite notice, payment, accord and satisfaction, and compromise and settlement.

36. Plaintiffs' nuisance claims are barred to the extent that they lack the statutory authority to bring a nuisance claim under West Virginia law.

37. Plaintiffs' statutory nuisance claim is barred because the statutes upon which Plaintiffs rely, including West Virginia Code §§ 7-1-3kk, 8-12-5(23), and 16-3-6, are unconstitutionally vague.

38. Plaintiffs' claim of public nuisance is barred or limited because no action of Defendant involved interference with real property; illegal conduct perpetrated by third parties involving the use of an otherwise legal product does not involve a public right against the distributor sufficient to state a claim for public nuisance; the alleged public nuisance would have impermissible extraterritorial reach; and the alleged conduct of Defendant is too remote from the alleged injury as a matter of law and due process.

39. Plaintiffs are barred from recovery against Defendant because there is no proximate causation between the alleged acts or omissions of Defendant and the damages alleged to have been sustained by Plaintiffs.

40. Plaintiffs' damages, if any, were caused by the active, direct, and proximate negligence or actual conduct of entities or persons other than Defendant, and in the event that Defendant is found to be liable to Plaintiffs, Defendant will be entitled to indemnification, contribution, and/or apportionment.

41. Plaintiffs' claims are barred, in whole or in part, by failure to establish causation.

42. Plaintiffs' claims are barred by criminal acts of third parties.



43. Any damages and/or injuries allegedly sustained by Plaintiffs were directly and proximately caused by independent, intervening and/or superseding causes, factors or occurrences, which were not reasonably foreseeable to Defendant and for which Defendant is not liable.

44. Any and all losses or claims allegedly sustained by Plaintiffs are the result of acts and/or omissions of persons over whom Defendant does not, or did not, have any direction or control, and for whose actions or omissions Defendant is not liable.

45. Defendant is not liable for any statements in the Manufacturer Defendants' branded or unbranded materials.

46. Plaintiffs' claims are barred to the extent that the subject prescription medications were misused, modified, altered, or changed from the condition in which they were sold, which misuse, modification, alteration, or change caused or contributed to cause Plaintiffs' alleged injuries or damages.

47. Plaintiffs' injuries and damages, if any, are the result of forces of nature over which Defendant had no control or responsibility.

48. Defendant is not liable for any injuries or expenses allegedly incurred by Plaintiffs to the extent the injuries or expenses as alleged may have resulted from the pre-existing and/or unrelated medical conditions of the users of the subject prescription medications.

49. Any injuries and/or damages sustained by Plaintiffs were caused, in whole or part, by its own failure to effectively enforce the law and prosecute violations thereof and any recovery by Plaintiffs are barred or, alternatively, should be diminished according to its own fault.

50. Plaintiffs' claims are barred, in whole or in part, because Plaintiffs' alleged injuries or damages, if any, were caused by illegal and/or illicit use, misuse, or abuse of the subject prescription medications by the users, for which Defendant is not liable.

51. Plaintiffs' claims are barred, in whole or in part, because neither the users of the subject prescription medications nor their prescribers relied to their detriment upon any statement by Defendant in determining to use or prescribe the subject prescription medications.

52. Plaintiffs' claims are preempted by federal law, including (without limitation) the federal Controlled Substances Act and the Food, Drug, and Cosmetic Act ("FDCA").

53. Plaintiffs' claims are barred, in whole or in part, because they are preempted by federal laws and regulations and/or state law, including, but not limited to, the Controlled Substances Act and the Food, Drug, and Cosmetic Act and the regulations promulgated pursuant to them, the Supremacy Clause of the United States Constitution, and/or the West Virginia Controlled Substances Act, W.Va. Code § 60A-1-101, *et seq.*

54. Plaintiffs may not recover against Defendant because the methods, standards, or techniques of distributing of the subject prescription medications complied with and were in conformity with the generally recognized state of the art at the time the product was designed, manufactured, labeled, and distributed.

55. Plaintiffs' claims are barred to the extent they are based on any allegations involving failure to provide adequate warnings or information because all warnings or information that accompanied the allegedly distributed products were approved by the United States Food & Drug Administration for a product approved under the Federal Food, Drug, and Cosmetic Act (21 U.S.C. Section 301 *et seq.*), as amended, or Section 351, Public Health Service Act (42 U.S.C. Section 262), as amended, or the warnings and information provided were those stated in monographs developed by the United States Food & Drug Administration for pharmaceutical products that may be distributed without an approved new drug application.

56. Plaintiffs' claims are barred, in whole or in part, for failure to exhaust administrative remedies.

57. Plaintiffs' claims are barred, in whole or in part, because federal agencies have exclusive or primary jurisdiction over the matters asserted in the Complaint.

58. Plaintiffs' claims are preempted insofar as they conflict with Congress' purposes and objectives in enacting relevant federal legislation and authorizing regulations, including the Hatch-Waxman amendments to the FDCA and implementing regulations. *See Geier v. Am. Honda Co.*, 529 U.S. 861 (2000).

59. To the extent that Plaintiffs rely on letters or other informal guidance from the DEA to establish Defendant's regulatory duties, such informal guidance cannot enlarge Defendant's regulatory duties in the absence of compliance by DEA with the requirements by the Administrative Procedure Act, 5 U.S.C. § 551 *et seq.*

60. If Plaintiffs incurred the damages alleged, which is expressly denied, Defendant is not liable for damages because the methods, standards, or techniques of designing, manufacturing, labeling, and distributing of the prescription medications at issue complied with and were in conformity with the laws and regulations of the Controlled Substances Act, the FDCA, and the generally recognized state of the art in the industry at the time the product was designed, manufactured, labeled, and distributed.

61. Plaintiffs' claims are barred, in whole or in part, by conflict preemption as set forth in the United States Supreme Court's decisions in *PLIVA, Inc. v. Mensing*, 131 S. Ct. 2567 (2011) and *Mutual Pharm. Co. v. Bartlett*, 133 S. Ct. 2466 (2013).

62. To the extent Plaintiffs assert claims that depend solely on violations of federal law, including any claims of a "fraud on the FDA" with respect to the Manufacturer Defendants'

disclosure of information related to the safety of their medications at issue, such claims are barred and should be dismissed. *See Buckman v. Plaintiffs' Legal Comm.*, 531 U.S. 341 (2001).

63. To the extent Plaintiffs assert claims that depend solely on violations of federal law, including any claims of “fraud on the Drug Enforcement Administration” (“DEA”) with respect to Defendant’s compliance with statutes or regulations administered and/or enforced by the DEA, such claims are barred and should be dismissed. *See Buckman v. Plaintiffs' Legal Comm’n*, 531 U.S. 341 (2001).

64. Plaintiffs’ claims are barred, in whole or in part, by the deference that common law accords discretionary actions by the FDA under the FDCA and discretionary actions by the DEA under the Controlled Substances Act.

65. Plaintiff’s claims are barred in whole or in part because Plaintiffs suffered no injuries or damages as a result of any action by Defendant.

66. Plaintiffs’ Complaint is barred, in whole or in part, by the doctrines of acquiescence, settlement, or release.

67. Plaintiffs’ claims are barred, in whole or in part, by the economic loss doctrine.

68. Plaintiffs’ claims against Defendant are barred to the extent they rely, explicitly or implicitly, on a theory of market-share liability.

69. Plaintiffs’ Complaint is barred, in whole or in part, because the derivative injury rule and the remoteness doctrine bar Plaintiffs from recovering payments that it allegedly made on behalf its residents to reimburse any expenses for health care, pharmaceutical care, and other public services.

70. To the extent that Plaintiffs seek punitive, exemplary, or aggravated damages, any such damages are barred because the product at issue, and its labeling, were subject to and received pre-market approval by the FDA under 52 Stat. 1040, 21 U.S.C. § 301.

71. The alleged injuries and damages asserted by Plaintiffs are too remote and/or speculative from the alleged conduct of Defendant to be a basis for liability as a matter of law and due process and derive solely from the claims of others.

72. Plaintiffs are barred from recovery by Plaintiffs' failure to mitigate damages.

73. Plaintiffs, to the extent they are seeking any damages in their capacity as a third-party payor, cannot recover as damages the costs of healthcare provided to insureds.

74. To the extent Plaintiffs attempt to seek equitable relief, Plaintiffs are not entitled to such relief because Plaintiffs have an adequate remedy at law.

75. Plaintiffs would be unjustly enriched if allowed to recover on any of their claims.

76. Plaintiffs' claims are barred, reduced, and/or limited pursuant to the applicable West Virginia statutory and common law regarding limitations of awards, caps on recovery, and setoffs.

77. A specific percentage of the tortious conduct that proximately caused the injury or loss to person or property is attributable to one or more persons from whom Plaintiffs do not seek recovery in this action. Should Defendant be held liable to Plaintiffs, which liability is specifically denied, Defendant would be entitled to a credit or set-off for all sums of money received or available from or on behalf of any tortfeasor(s) for the same injuries alleged in Plaintiffs' Complaint.

78. Plaintiffs' claims are barred and/or reduced by contributory or comparative negligence and contributory or comparative fault.

79. Plaintiffs' injuries, losses, or damages, if any, were caused by or contributed to by other persons or entities, whether named or not named as parties to this action, who may be jointly and severally liable for all or part of Plaintiffs' alleged injuries, losses, or damages, if any. Defendant will request apportionment of the fault pursuant to West Virginia Code § 55-7-13a, *et seq.*, of all named parties to this action, whether or not they remain parties at trial.

80. A percentage of each Plaintiffs' alleged injury or loss, if proven, is attributable to (i) each Plaintiff, (ii) other parties from whom Plaintiffs seek recovery, and (iii) persons from whom Plaintiffs do not seek recovery in this action, including, but not limited to, prescribing practitioners, non-party pharmacies and pharmacists, individuals and entities involved in diversion and distribution of prescription opioids, individuals and entities involved in distribution and sale of illegal opioids, individuals involved in procuring diverted prescription opioids and/or illegal drugs, delivery services, federal, state, and local government entities, and health insurers and pharmacy benefit managers.

81. Any damages that Plaintiffs may recover against Defendant must be reduced to the extent that Plaintiffs are seeking to recover damages for alleged injuries or expenses related to the same user(s) of the subject prescription medications, or damages recovered or recoverable by other actual or potential plaintiffs. Any damages that Plaintiffs may recover against Defendant must be reduced to the extent they unjustly enrich Plaintiffs.

82. Defendant's liability, if any, will not result from Defendant's conduct but solely the result of an obligation imposed by law, and thus Defendant is entitled to complete indemnity, express or implied, by other parties.

83. Plaintiffs' claims for punitive or exemplary damages are barred because Plaintiffs cannot prove by clear and convincing evidence that Defendant has acted or failed to act in a manner that entitles Plaintiffs to recover punitive or exemplary damages.

84. The imposition of punitive and/or exemplary damages against Defendant would violate its rights under the Due Process clauses in the Fifth and Fourteenth Amendments to the Constitution of the United States, the Excessive Fines clause in the Eighth Amendment to the Constitution of the United States, the Double Jeopardy clause in the Fifth Amendment to the Constitution of the United States, the equal protection clause of the Fourteenth Amendment to the Constitution of the United States, and the Sixth Amendment to the Constitution of the United States, and provisions of the West Virginia Constitution including, but not limited to, Article 3, Sections 4, 5, 6 and 10, in various circumstances in this litigation, including but not limited to the following:

- a. imposition of punitive damages by a jury which is inadequately instructed regarding the rationale behind punitive damages, the standards/criteria governing such an award of damages, and/or the limits of such damages;
- b. imposition of punitive damages where applicable state law is impermissibly vague, imprecise, or inconsistent;
- c. imposition of punitive damages that employs a burden of proof that is less than clear and convincing evidence;
- d. imposition of punitive damages without bifurcating the trial and trying all punitive damages issues separately, only if and after a finding on the merits of the liability of the Defendant;

- e. imposition of punitive damages without any predetermined limit on any such award;
- f. imposition of punitive damages which allows multiple punishment for the same alleged act(s) or omission(s);
- g. imposition of punitive damages without consistent appellate standards of review of such an award;
- h. imposition of a penalty, criminal in nature, without according to Defendant the same procedural protections that are accorded to criminal defendants under the constitutions of the United States, West Virginia, and any other state whose laws may apply; and
- i. imposition of punitive damages that otherwise fail to satisfy Supreme Court precedent, including, without limitation, *Pacific Mut. Life Ins. Co. v. Haslip*, 499 U.S. 1 (1991); *TXO Production Corp. v. Alliance Resources, Inc.*, 509 U.S. 443 (1993); *BMW of N. Am. v. Gore*, 517 U.S. 559 (1996); *State Farm Ins. Co. v. Campbell*, 538 U.S. 408 (2003); and *Philip Morris USA v. Williams*, 549 U.S. 346 (2007).

85. Defendant's rights under the Due Process Clause of the U.S. Constitution and applicable state Constitution or statute are violated by any financial or other arrangement that might distort a government attorney's duty to pursue justice rather than his or her personal interests, financial or otherwise, in the context of a civil enforcement proceeding, including by Plaintiffs' use of a contingency fee contract with private counsel.

86. Plaintiffs' claims are barred, in whole or in part, because they violate the *Ex Post Facto* clauses of the U.S. Constitution and Article 3, Section 4 of West Virginia Constitution,



insofar as Plaintiffs seek to impose liability retroactively for conduct that was not actionable at the time it occurred.

87. Plaintiffs' claims are barred, in whole or in part, by the Due Process Clause of the Fifth and Fourteenth Amendments to the United States Constitution and Article 3, Section 10 of the West Virginia Constitution because substantive due process forbids the retroactive imposition of changing and unclear legal interpretations of the West Virginia Uniform Controlled Substances Act.

88. Plaintiffs' claims are barred, in whole or in part, by the political question and separation of powers doctrine.

89. Plaintiffs' claims are barred in whole or in part by the Dormant Commerce Clause of the United States Constitution.

90. To the extent that Plaintiffs' claims relate to Defendant's alleged advertising, public statements, lobbying, or other activities protected by the First Amendment to the Constitution of the United States or by the Constitution of the State of West Virginia or that of any other state whose laws may apply, such claims are barred.

91. Plaintiffs' claims are barred to the extent that Defendant has valid defenses which bar recovery by those persons on whose behalf Plaintiffs purportedly seek recovery.

92. Defendant adopts by reference all defenses asserted in any party's motion to dismiss filed herein.

93. Defendant asserts all applicable defenses under Federal Rules of Civil Procedure 8(c) and 12(b) and/or West Virginia Rules of Civil Procedure 8(c) and 12(b), as investigation and discovery proceeds.

94. Defendant reserves the right to assert any other defense available under the West Virginia Code, West Virginia common law and/or the West Virginia Constitution.

95. Defendant is immune from some or all of Plaintiffs' claims pursuant to Section 30-5-21(a) of the West Virginia Code.

96.

97. Plaintiffs' RICO claims are barred, in whole or in part, by the absence of the existence of an "enterprise" for the purposes of RICO liability.

98. Plaintiffs' RICO claims are barred, in whole or in part, by the absence of an "association" between Defendant and any other defendant or entity alleged to be part of an "enterprise" for purposes of RICO.

99. Plaintiffs' RICO claims are barred, in whole or in part, because Defendant did not participate in any "enterprise."

100. Plaintiffs' RICO claims are barred, in whole or in part, because Defendant did not engage in a pattern of racketeering activity under RICO.

101. Plaintiffs' RICO claims are barred, in whole or in part, because Defendant did not knowingly agree to facilitate any schemes that include the operation or management of a RICO enterprise.

102. Plaintiffs' claims are barred, in whole or in part, by the absence of a conspiracy, including a lack of agreement to commit any unlawful predicate acts, necessary to establish a valid RICO claim under 18 U.S.C. § 1962(d).

103. Plaintiffs' RICO claims are barred, in whole or in part, because Defendant did not commit any predicate acts that may give rise to liability under 18 U.S.C. § 1962.

104. Plaintiffs' RICO claims are barred, in whole or in part, because there are no allegations that Defendant adopted the goal of furthering or facilitating any criminal endeavor as necessary to support Plaintiffs' civil conspiracy theory of liability.

105. The federal RICO statute is unconstitutionally vague.

106. Plaintiffs' alleged damages do not constitute injury to business or property interests cognizable under RICO.

107. Plaintiffs' RICO claims are barred, in whole or in part, because the alleged predicated acts, namely failure to report and halt suspicious orders under the Controlled Substances Act, do not qualify as racketeering activity for purposes of RICO.

108. Plaintiffs' claims are barred because Plaintiffs have not and cannot identify a criminal predicate act sufficient to give rise to liability under the statute, a conviction, or that Plaintiffs suffered any injury that resulted from the alleged criminal act.

109. Defendant is entitled to, and claims the benefit of, all defenses and presumptions set forth in or arising from any rule of law or statute of this State or any other state whose substantive law might control the action.

110. Plaintiffs' claims are subject to all defenses that could be asserted if Plaintiffs' claims were properly made by individuals on whose behalf or for whose alleged damages Plaintiffs seek to recover.

111. Defendant adopts by reference any additional applicable defense pled by any other defendants not otherwise pled herein. Defendant reserves the right to assert all defenses, whether affirmative or otherwise, that may become apparent or available to them during the course of this litigation, and hereby provide notice of their intent to add and rely upon any such other and further defenses in the future.

**DEMAND FOR BIFURCATED TRIAL**

If any Plaintiff is permitted to proceed to trial upon any claims for punitive or exemplary damages, such claims, if any, must be bifurcated from the remaining issues pursuant to Section 55-7-29 of the West Virginia Code.

**DEMAND FOR JURY TRIAL**

Answering Defendant hereby demands a trial by jury of all issues so triable. Answering Defendant also hereby reserves the right to have each action coordinated in this litigation remanded to its original jurisdiction for trial.

Dated: December 19, 2019

Respectfully submitted,

**REED SMITH LLP**

/s/ Robert A. Nicholas

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*Counsel for AmerisourceBergen  
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**CERTIFICATE OF SERVICE**

I, Robert A. Nicholas, hereby certify that, on December 19, 2019, the foregoing AmerisourceBergen Drug Corporation's Answer to Plaintiffs' Corrected Second Amended Complaint with Affirmative Defenses was served on all counsel of record via the Court's CM/ECF notification system.

/s/ Robert A. Nicholas  
Robert A. Nicholas